CITY OF COLORADO SPRINGS

June 28, 2013

U.S. EPA Region 8
NPDES Enforcement Unit
1595 Wynkoop Street
Denver, CO 80202-1129
ATTN: Alysia Tien (8ENF-W-NP)

Colorado Department of Public Health and Environment
WQCD-PE-B2
4300 Cherry Creek Drive South
Denver, CO 80246–1530
ATTN: Nathan Moore

RE: Municipal Stormwater Inspection Report – Summary of Corrective Actions and Response to Findings, NPDES Permit Number – COS000004

Dear Ms. Tien and Mr. Moore:

After careful consideration of the Municipal Stormwater Inspection Report (Report) documenting the findings of the inspection of the City of Colorado Springs (City) Municipal Separate Storm Sewer System on February 4-7, 2013, the City has prepared the enclosed Summary of Corrective Actions and Response to Findings for your review and approval. As instructed, each finding is individually addressed by finding number in the order provided in the "Findings and Corrective Actions Summary Table" on pages 14 and 15 of the Report. Except where noted, the corrective actions have been implemented or are being implemented to ensure compliance with the permit. Please contact Steve Gardner (719) 385–5403 or sgardner@springsgov.com if you have any questions.

CERTIFICATION STATEMENT:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Timothy R. Mitros, P.E. – Engineering Development Review and Stormwater Manager

June 27, 2013
Date

Attachment

c: Laura Neumann, Chief of Staff
Steve Gardner, Stormwater Program Manager

Summary of Corrective Actions and Response to Findings City of Colorado Springs Phase I MS4 Inspection Report Colorado Discharge Permit System, Permit #: COS000004

June 28, 2013

Prepared by
City of Colorado Springs
Public Works
Engineering Division
Development Review and Stormwater

Finding 1PM – Communication and Program Priority Concerns Related to the City's Program Reorganization

During the EPA's inspection, the City personnel indicated that the City's Engineering Division had undergone a major reorganization in the 4th Quarter of 2012 which divided personnel and resources used to implement the MS4's Stormwater program. The new structure involved the reassignment of city personnel, previously dedicated solely to the implementation of the City's Stormwater program, into other City programs. It also increased the range of duties performed by those that were reassigned. The City's personnel indicated that the division of the staff into separate programs resulted in some communications/coordination issues. In addition, the personnel were no longer primarily focused on Stormwater program duties and priorities.

Permit Requirements:

Part I.B.3 of the Permit effective 11/01/11 – 10/31/16 and Part I.B.3 of the Permit effective 03/04/04 – 02/28/09 (administratively extended) state that "The permittee shall provide adequate finances, staff, equipment, and support capabilities to implement...the Stormwater Management Program."

Corrective Actions:

None.

Recommendations:

In order to implement the City's MS4 Stormwater Management Program, adequate support capabilities are necessary to carry out the various program components. This includes, ensuring that the staff responsible for implementing the program are allowed adequate time and resources to perform tasks related to the Stormwater Management Program.

It is recommended that the City develop a communication strategy/procedure to ensure that stormwater activities are coordinated effectively between programs. It is also recommended that the City develop a mechanism to ensure that the activities related to compliance with the Permit remain a priority and that they are not severely impacted by conflicting priorities established by the new personnel structure.

City Response to Recommendations:

Since the City's Stormwater Enterprise was disbanded in 2009, stormwater management activities have been re-distributed among the Engineering and Capital Divisions within the Public Works Department. Coordination and communication among the stormwater office and field staff has been effective, but could be improved. The Development Review and Stormwater Team, which currently manages the stormwater and MS4 programs, coordinates with the Capital Team to manage capital and design projects, the Asset Management Team for certain aspects of the Illicit Discharges Management Program, and the Inspection Team for field inspections related to the Construction Sites Program. Short term, the Development Review and Stormwater Team intends to move the field inspectors related to the Construction Sites Program back under the control of the Development Review and Stormwater Team to enhance control and coordination. Long term, the City is exploring funding solutions for the stormwater program that include a stormwater utility and a regional stormwater authority similar to the Southeast Metro Stormwater Authority (SEMSWA).

MONITORING (MN) REVIEW FINDINGS

Finding 1MN – Retention of Sampling and Analytical Data Records

The wet weather sample monitoring and analysis for the City was implemented primarily by the USGS. At the time of the inspection, the USGS was providing summary reports of results to the City but was not submitting specific sampling information such as laboratory analytical reports or sampling information (e.g. sampling date/time, preservation method, personnel performing sampling, etc.). During the inspection, it was identified that the City did not request or maintain any of the detailed records of the sampling and analysis performed by the USGS.

Permit Requirements:

Part I.D.3b of the Permit effective 11/01/11 – 10/31/16 states, "The permittee shall establish and maintain records for all monitoring required by Part I.D.1(c) of this permit. Those records shall include the following:

1) The date, type, exact location, and time of sampling or measurements;
2) The individual(s) who performed the sampling or measurements;
3) The dates(s) the analyses were performed;
4) The individual(s) who performed the analyses;
5) The analytical techniques or methods used;
6) The results of such analyses; and
7) Any other observations which may result in an impact on the quality or quantity of the discharge as indicated in 40 [Code of Federal Regulations] CFR 122.34 (i)(1)(iii).

The permittee shall retain for a minimum of three (3) years records of all monitoring information, including all original strip chart recordings for continuous monitoring instrumentation, all calibration and maintenance records, copies of all reports required by this permit and records of all data used to complete the application for this permit. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the permittee or when requested by the Division or EPA."

Corrective Actions:

The City shall develop a procedure for obtaining and maintaining monitoring records for sampling and analysis as required by the Permit. Submit a copy of the procedure which addresses this permit requirement to the EPA and CDPHE.

Recommendations:

None.

City Response to Corrective Actions:

The USGS has been keeping the records specified in Part I.D.3b of the Permit, and will begin providing these records to the City. The procedure for obtaining and maintaining monitoring records for sampling and analysis will be reviewed and revised, if necessary, to reflect submittal of all monitoring records to the City annually.

Finding 2MN – Lack of Awareness of 40 CFR 136 Requirements and Review of Monitoring Data to Ensure These Requirements Are Met

During the inspection, the City personnel managing the monitoring program appeared to be unfamiliar with the 40 CFR Part 136 method requirements specific to the sampling and analysis procedures being performed under the City's monitoring plans. In addition, there was no mechanism in place for City personnel to evaluate monitoring data to ensure that the 40 CFR 136 requirements were being met.

Permit Requirements:

Part II.B.3a of the Permit effective 03/04/04 – 02/28/09 (administratively extended) and Part I.D.3a of the Permit effective 11/01/11 – 10/31/16 state that "Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been approved by the Division (61.8(4)(j))." and "All sampling shall be performed by the permittee according to specific methods in 40 C.F.R. Part 136; methods approved by EPA pursuant to 40 C.F.R. Part 136; or methods approved by the Division, in the absence of a method specified in or approved pursuant to 40 C.F.R. Part 136.", respectively.

Corrective Actions:

None.

Recommendations:

It is recommended that the City implement an internal quality control mechanism and procedures to ensure that the sampling and analysis performed to meet permit requirements meets the 40 CFR 136 requirements.

City Response to Recommendations:

The City will review the procedures for sampling and analysis to ensure that the requirements of 40 CFR 136 are met.

Finding 3MN – Incomplete Data Collection and Annual Reporting

The benthic data collected as part of the City's wet weather monitoring plan was not reported in the 2011 Annual report. In addition, the morphological data was not collected in 2010. Morphological data was collected in March 2011 but was not reported in the 2011 Annual Report. The 2011 Annual Report indicated that the data collected in 2011 would not be reported until the 5-year wet weather summary was submitted.

Permit Requirements:

Part I.D.1.a. of the Permit effective 03/04/04 – 02/28/09 (administratively extended) states that "Cross-sections shall be monitored at least once each year" as related to the "Qualitative Monitoring of Stream and riparian Zones within the MS4 and Receiving Waters – Morphological Assessment."

Part I.F. of the Permit effective 03/04/04 – 02/28/09 (administratively extended) states that "The permittee shall prepare an annual systemwide report to be submitted by April 1 of each year, covering the previous January 1 through December 31" and that the report shall include "A summary of the data, including numeric monitoring data that is accumulated throughout the reporting year."

Part I.D.2.a. of the Permit effective 11/01/11 – 10/31/16 states that "The permittee shall submit a Monitoring Annual Report to the Division by June 1 of each year, covering the previous January 1 through December 31" and that the report shall include a "Summary of the monitoring program work to date..."

Corrective Actions:

The City shall implement a mechanism to ensure that all of the required monitoring identified in the Permit and within the City's CDPHE approved monitoring plan(s) is performed and that all data collected during the reporting year are included in the Annual Report submitted to CDPHE. The City shall submit a description of how this issue will be addressed as well as the morphological data collected March 2011 to the EPA and CDPHE.

Recommendations:

None.

City Response to Corrective Actions:

The City has submitted an "edited" version of the wet weather monitoring data for the last couple of years, but has collected cross-sectional and benthic data in accordance with permit requirements. The City will revise the contents of the annual report format to include all benthic and monitoring data collected for wet weather monitoring beginning with the 2013 Annual Report in accordance with permit requirements.

Finding 4MN – CDPHE Approval Not Obtained for Monitoring Program Plan Modifications

At the time of the EPA's inspection, the City personnel could not provide documentation that they had received approval for the modifications made to the City of Colorado Springs Municipal Storm Sewer System Permit (COS-000004) Monitoring Plan prior to implementing it. The original plan was prepared 12/13/02 and revised 05/21/03 but the plan being implemented by the City was prepared 8/31/12.

Part 7, "Potential Modifications" of the City of Colorado Springs Municipal Storm Sewer System Permit (COS-000004) Monitoring Plan prepared 8/31/12 states that "The CCS monitoring program must be afforded the flexibility to:

1. Adopt new techniques as they are developed.
2. Modify existing techniques in response to information gained through implementation of the program.
3. Modify monitoring site locations and/or analytes if data reveals the program would be enhanced by doing so.

For this program to remain flexible, it may be necessary to make minor adjustments during implementation without prior approval of the CDPHE. Examples of these changes could include changing the location of a monitoring site or modifying the sampling frequency for bacteria, all while maintaining a consistent level of effort. The CDPHE will be notified of these minor adjustments in the Annual Report." This is not consistent with the program modification requirements of the Permit.

Permit Requirements:

Part I.C.3 of the Permit effective 11/01/11 – 10/31/16 states,

Program Modifications

a. The approved Programs shall not be modified by the permittee without the prior approval of the Division.
b. Modifications shall not become enforceable permit conditions until such time as the modifications are formally approved.
c. Modification requests and/or notifications shall be signed in accordance with Part I.G."

Corrective Actions:

In order to comply with the Permit requirements, the City shall obtain formal approval for the City of Colorado Springs Municipal Storm Sewer System Permit (COS000004) Monitoring Plan prepared 8/31/12. The language referenced above from Part 7, "Potential Modifications" shall be removed or modified such that it complies with the permit requirement and ensures that all modification, including "minor adjustments", are formally approved by the CDPHE prior to being implemented. The City shall submit the modified plan to the CDPHE for approval along with a courtesy copy to the EPA.

Recommendations:

None.

City Response to the Recommendations:

The City of Colorado Springs will revise the Monitoring Plan prepared 8/31/12 in accordance with permit requirements to ensure that all modifications, including "minor adjustments", are formally approved by the CDPHE prior to implementation. The City will also submit the Monitoring Plan to CDPHE to obtain formal approval for the monitoring plan prepared 8/31/12, that includes redlines of the effective permit revised 05/21/03 such that changes can be easily tracked.

ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM REVIEW FINDINGS

Finding 1ID – Lack of Illicit Discharge Training

The City's Illicit Discharge Detection and Elimination (IDDE) Program document, issued 10/1/2012 and revised 01/21/2013, states that "Code Enforcement has the authority to investigate and enforce wastewater discharge complaints on private property from City Code, Chapter 6, Neighborhood Vitality/Community Health."

The Colorado springs Fire Department HMRT has a non-emergency potential spill notification system available to citizens and City personnel to call to report a potential illicit discharge. Calls received are screened for appropriate response and follow-up. Spills identified as Hazardous Material (HazMat) spills were handled by the HMRT and non-HazMat spills were referred to the CCS Code Enforcement.

On 2/6/13, the EPA inspectors performed a site visit of the call center at the Colorado Springs Police Operations Center. Lisa Mitchell, Training manager, met with the EPA inspectors and described the process for how calls were received and distributed for response. Ms. Mitchell indicated that all non-HazMat spill calls were sent to the CCS Code Enforcement for follow-up.

At the time of the inspection, Lisa Ross, Senior Engineer, indicated that the City's program had not developed formal IDDE stormwater specific training for the CCS Code Enforcement personnel that responded to these calls.

The City's IDDE Program document identifies the Fire Marshal and the CSU Industrial Pretreatment Section as the entities responsible for performing "preventative inspections" for identifying illicit discharges. The Colorado Springs Fire Department, CSU, the Regional Floodplain Administration, the CCS Public Works and the CCS Code Enforcement were responsible for responding to IDDE issues. The Regional Floodplain Administration had no direct involvement in IDDE response. Information on spills and discharges identified by the Regional Floodplain Administration employees was forwarded on to the appropriate authority within the City by referring them to the non-emergency notification number. As indicated in the City's IDDE program document, the Colorado Springs Fire Department's HMRT and CSU primarily responded to spills and discharges related to their systems. Employees for both entities received general training on how to handle spills and discharges from their own programs. The CSU employees were trained on how to respond to spills from their system, such as spills with relation to

sanitary sewer overflows and natural gas distribution system oil spills. The HMRT employee training consisted of procedures on how to identify and remove hazardous materials spills.

Fire Marshal and CSU preventive inspections:

The Fire Marshal conducted preventive inspections of permitted industrial and commercial facilities that stored, transported, dispensed, used or handled hazardous materials. The Fire Marshal's inspections primarily focused on potential fire and safety concerns. The City was notified of any IDDE concerns identified by the Fire Marshal but the identification of illicit discharges related to stormwater was not the focus of these inspections.

The CSU Industrial Pretreatment Section conducted annual inspections of permitted industrial users. The facilities were inspected and monitored annually for pretreatment permit compliance. Similar to the Fire Marshal inspections, the City was notified of any IDDE concerns identified by CSU but the identification of illicit discharges related to stormwater was not the focus of these inspections.

At the time of the EPA's inspection, the City did not coordinate with the Fire Marshal or CSU to ensure that consistent IDDE procedures were being implemented for the identification of illicit discharges.

The City performed annual training for City Engineering Inspectors, Stormwater Technicians and CCS Street Division staff. According to Alan Williamson, Engineering Technician II, the training consisted of a presentation which included a review of current IDDE documents and a discussion on identification and response to illicit discharges. Employees who attended the training were also provided with a list of procedures and contacts for the City's IDDE program. The training was not mandatory and there was no mechanism in place to ensure that all City personnel involved in illicit discharge detection had received the training on an annual basis.

Permit Requirements:

Part I.B.1.c.3)c) of the Permit effective 03/04/04 – 02/28/09 (administratively extended) states, "A staff training program for field investigation and elimination of potential illicit discharges, illegal dumping and illicit connections identified by the ongoing field screening program, complaints, or other sources, shall continue to be implemented."

Part I.B.1.b.2)c) of the Permit effective 11/01/11 – 10/31/16 states, "The permittee shall continue to implement a program to train municipal staff to recognize and appropriately respond to illicit discharges observed during typical duties. The program must address who will be likely to make such observation and therefore receive training, and how staff will report observed suspected illicit discharges."

Corrective Actions:

The City shall develop and implement a training program or mechanism to ensure that the employees involved in identification and response to illicit discharges within the MS4 receive adequate training on IDDE procedures. This shall include a tracking mechanism for employee training to ensure that all personnel involved in IDDE response have received the appropriate training. Submit a copy of a procedure to address this permit requirement to the EPA and CDPHE.

Recommendations:

It is recommended that the current City's Illicit Discharge Detection and Elimination (IDDE) Program document, issued 10/1/2012 and revised 01/21/2013, be reviewed and updated to ensure that all entities listed within it are involved in implementing the IDDE program as indicated. Those that are not involved in the direct implementation of the program (i.e. the Regional Floodplain Administration) should be removed.

It is also recommended that the City establish procedures for coordinating with the other entities (e.g. Fire Marshal, CSU, CCS Code Enforcement, etc.) involved in identification and response to illicit discharges to ensure that illicit discharge identification and response procedures are being implemented consistently.

City Response to Corrective Actions and Recommendations:

The City will update the procedures to train municipal staff to implement the IDDE program by identifying the personnel responsible for implementing the program and tracking them in perpetuity to ensure that they have been trained initially and continue to receive training updates. New employees will be identified at least quarterly so that training may be initiated.

The City will also update the IDDE program to refine the entities involved in the program and to remove the entities that are not. Procedures for coordinating with other entities will also be revised and refined, as necessary, to ensure that the IDDE program is implemented consistently throughout the CCS.

Finding 2ID – "Potential Illicit Discharge" Record Keeping

According to Ryan Bouton, Engineering Technician II, no documentation was being maintained for investigations of potential illicit discharges that were later determined not to be "illicit discharges".

Permit Requirements:

Part I.B.1.b.2)d) of the Permit effective 11.01.11 – 10/31/16 states, "A record of all reported illicit discharges and the permittee's response shall be maintained."

Corrective Actions:

None.

Recommendations:

It is recommended that the City maintain records of all reported discharges, regardless of the outcome of the investigation, to document that all reported non-stormwater discharges have been investigated.

City Response to Recommendations:

The City will keep a record of all reported illicit discharges beginning in June, 2013.

Finding 3ID – Illicit Discharge Database Operating Procedures

At the time of the inspection, Mr. Bouton provided an overview of Source Identification and Mapping database used by the City to track illicit discharge reports and investigations. All identified illicit discharges were tracked with GIS and entered into the database. The GIS information was used to track past spills and identify repeat offenders. Entries into the database included information such as the case number, date reported, date evaluated, event time, date entered into the database, event location (e.g., the address, city, State and zip code), quantity, reporting party and type of spill. Mr. Bouton had received training on the use of the database from a City employee that was no longer with the program. It appeared that Thomas Repp, a former City employee, had input non-IDDE investigated discharge information into the database in the past but Mr. Bouton was no longer performing that task. There were no written procedures or training documents for inputting information into the database.

Corrective Actions:

None.

Recommendations:

The City should develop a standard operating procedures or training documents to ensure that the entry of information into the database is consistent. At the time of the inspection Mr. Bouton was the primary user of the database however, consistency in data entry could become an issue should more City personnel utilize the database in the future.

City Response to Recommendations:

The City will develop a written standard operating procedure that explains the collection and documentation of information pertaining to illicit discharges and the population of the IDDE database.

Finding 4ID – Illicit Discharge Code Update

Part 2, 3.8.201.B.2 of the Discharge Prohibitions of the Article 8 Stormwater Quality Management and Discharge Control Code lists discharges from potable water sources, individual street washing and uncontaminated water from irrigation system meter pits as allowable discharges. These are not listed as allowable non-stormwater discharges within the Permit and the City did not have documentation of prior approval from CDPHE to list them as such.

Part 2, 3.8.201.B.4 of the Discharge Prohibitions of the Article 8 Stormwater Quality Management and Discharge Control Code states, "With written concurrence to the City Council by ordinance, resolution or motion, the City Engineer may exempt in writing other nonstormwater discharges which are not a source not of pollutants to the City's MS4 or waters of the United States." This is not consistent with the permit requirements for approval of additional allowable non-stormwater discharges.

Permit Requirements:

Part I.B.1.b.1)b) of the Permit effective 11/01/11 – 10/31/16 states, "Unless identified by either the permittee or the Division as significant sources of pollutants to the State Waters, the following sources of non-stormwater discharges are excluded from the definition of "illicit discharge": landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration to separate storm sewers, uncontaminated pumped ground water, foundation drains, single family residential under drain systems, lawn watering, individual residential car washing, individual residential swimming pool and hot tub discharges, water-line flushing, flows from riparian habitats and wetlands, and water incidental to street sweeping (including associated sidewalks and medians) that is not associated with construction."

Part I.B.1.b.1)c) of the Permit effective 11/01/11 – 10/31/16 states that "The initial list and additions or modification to the list must be approved in accordance with Part I.C.3 of the Permit."

Part I.C.3 of the Permit effective 11/01/11 – 10/31/16 states, "Program Modifications

a. The approved Programs shall not be modified by the permittee without the prior approval of the Division.
b. Modifications shall not become enforceable permit conditions until such time as the modifications are formally approved.
c. Modification requests and/or notifications shall be signed in accordance with Part I.G."

Corrective Actions:

In order to be consistent with the permit requirements, the sections of Article 8 Stormwater Quality Management and Discharge Control Code identified above, must be removed or formally approved for inclusion by CDPHE. At the time of the inspection, Ms. Ross informed the EPA inspectors that they were in the process of working with CDPHE to update the City's Article 8 Stormwater Quality

Management and Discharge Control Code to be consistent with the permit requirements. Submit a copy of the updated Article 8 Stormwater Quality Management and Discharge Control code to the CDPHE and provide a copy to the EPA.

Recommendations:

None.

City Response to Corrective Actions:

The City has negotiated revised language for Article 8 with CDPHE to achieve consistency with the permit requirements. A copy of the updated Article 8 will be supplied to the EPA upon approval from CDPHE.

Finding 5ID – Illicit Discharge Mitigation Procedures

Conoco Gas Station Site Visit:

On 2/6/13, the EPA inspectors joined Mr. Bouton on an illicit discharge follow-up inspection at the Conoco Gas Station located on the corner of Palmer Park Boulevard and Potter Drive. The incident was reported to the City on 2/5/13 at approximately 1:30am. The City was informed that approximately 100 gallons of gasoline was spilled onto the pavement while an underground tank at the site was being refueled. It was estimated that 20 to 50 gallons of gasoline discharged into the MS4's storm drain system. Mr. Bouton coordinated with the State of Colorado's Department of Labor and Employment Oil and Public Safety Division to respond to the incident and directed the responsible party(s) to perform clean-up to mitigate the discharge.

At the time of the follow-up inspection, it appeared that all clean-up activities had concluded. The EPA inspectors observed traces of the dry absorption chemical cleaning product on the pavement at the spill location (see photos 258-260 of IDDE Oversight photo log). There was also a sheen observed in a nearby storm sewer drain that had received the discharge (see photos 261 and 262 of IDDE Oversight photo log). Mr. Bouton indicated that he would follow up with the responsible party to request additional clean-up of the site upon returning to the City office. It was brought to Mr. Bouton's attention that the weather conditions were overcast and snow was forecasted that afternoon. The EPA inspectors and Mr. Bouton left the site at 2:08 p.m. Snow began to fall in the area around 3:00pm, at which time Mr. Bouton had yet to contact the responsible party to instruct them to clean-up the residual materials observed at the site.

During the follow-up inspection, Mr. Bouton indicated that the City did not have any established procedures for clean-up of a site should the responsible party not comply in a timely manner with the City's requests to respond (e.g. clean-up needed prior to/during precipitation events). Due to reservations about removing the responsibility of performing clean-up activities from the responsible party(s), Mr. Bouton indicated that he was unsure whether the City would use its own resources to clean-up a spill and back charge the responsible party for instances in which the response was not timely.

Permit Requirements:

Part I.B.1.b.1) of the Permit effective 11/01/11 – 10/31/16 states that "The permittee shall continue to implement an ongoing program to detect and eliminate the source of the illicit discharges (or to confirm that the discharge no longer meets the definition of an illicit discharge) and improperly disposed materials into the MS4 in accordance with this program area and mitigate as required by I.B.1.b (2). Elimination of an illicit discharge shall include measures as necessary to address the source to prevent an ongoing discharge (e.g., cleaning up a spill, fixing a leak, removing a cross connection). The permittee shall review current City code to ensure it is adequate to meet this requirement, make

revisions if necessary by October 1, 2012, and notify the Division that this requirement has been met and if the City Code was revised in the following Annual report, due April 1, 2013."

Part I.B.1.b.3) of the Permit effective 11/01/11 – 10/31/16 states that "The permittee shall implement procedures to prevent, contain and respond to spills that may discharge or have discharged into the MS4 that are not composed entirely of stormwater except sources that are excluded from the definition of "illicit discharge in accordance with Parts I.B.1.b(1)(b), (c), and (d)."

Corrective Actions:

The city shall develop a procedure to ensure that an illicit discharge is eliminated and include measures to address the source to prevent an ongoing discharge (e.g., cleaning up a spill, fixing a leak, removing a cross connection) as well as timeframes for response actions performed by the City to ensure that IDDE response actions are performed in a timely manner. If not already performed, City personnel shall also review its current City code to ensure it is adequate to meet these permit requirements. Submit a copy of the procedure to address this corrective action to the CDPHE and provide a courtesy copy to the EPA.

Recommendations:

None.

City Response to Corrective Actions:

The City's IDDE procedure will be modified to include specific steps to be taken by City staff in response to an illicit discharge, including a timeline for response by the perpetrator of the illicit discharge, and response actions to be instigated by the City in the event that the perpetrator's response actions fail to eliminate the discharge and/or to adequately clean up the illicit discharge. A copy of the procedure will be submitted to CDPHE and EPA for review and approval in accordance with the permit requirements.

CONSTRUCTION SITE RUNOFF CONTROL PROGRAM (CS) REVIEW FINDINGS

Finding 1CS – Residential Waivers Issued for Water Quality Control Measures Without Required Justification

During the inspection, it was identified that, since 2008, seven water quality BMP waivers have been issued to developments. City code states that, when a city engineer determines that water quality impacts were minimal and water quality BMPs were impractical for a development, the site will be granted a waiver from the water quality BMPs based on submittal of sufficient justification. During the inspection, EPA inspectors reviewed the master development drainage plans provided to the City by development applicants for the seven residential waivers issued. The required justifications were not provided by the applicants or the city engineer to meet the waiver requirements as outlined in City code. Furthermore, issuance of these waivers does not appear to comply with requirements in the City's MS4 permit, issued by the CDPHE.

The City provided information on the seven developments that were issued water quality BMP waivers since 2008, that were also explained to be above 2 acres in size. The information is summarized in the table below:

Development Name	Drainage Report Submittal Date	Drainage Report Issue Date
Indigo Ridge North at Stetson Ridge	11/2012	12/2012
Indigo Ranch at Stetson Ridge	05/2008	02/2010
The Mountain Preserve	10/2009	11/2009
Cathedral Ridge at Garden of the Gods Club	07/2008	12/2010
Signature Point at Garden of the Gods Club	05/2009	11/2011
Austin Ridge Redevelopment	12/2011	01/2012
Parkview at Spring Creek Filing No. 2	03/2010	07/2010

The "Drainage Report Submittal Date" represents the date that the waiver is considered and the "Drainage Report Issue Date" represents the date the waiver is finalized.

A representative from the City's engineering group responsible for reviewing development plans explained that it was standard procedure to grant residential lot waivers (zoned R-1 6000) exempting permanent water quality feature requirements. Applicants used a mathematical calculation to determine development density based on the density of the entire proposed development, incorporating concentrated areas averaged with no-build areas. The City provided no analysis or documentation to support that the densities proposed from these calculations were protective of stormwater quality.

Permit Requirements:

The CDPHE permit in Part I (B) (1)(a)(2) and (a) states, "The permittee must implement and enforce a program to address storm water runoff from projects for which construction activities disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts. The permittee must: Implement and document strategies which include the use of structural and/or non-structural BMPs appropriate for the community, that address the discharge of pollutants from projects, or that follow principles of low-impact development to mimic natural (i.e., pre-development) hydrologic conditions at sites to minimize the discharge of pollutants and prevent or minimize adverse in-channel impacts associated with increased imperviousness. Strategies must include specific consideration to require BMPs that address specific pollutant sources associated with projects for industrial and commercial land uses determined to have an increased potential to cause an impact on storm water runoff quality. Minimum technical requirements for required structural BMPs shall be documented and be based on those specified in the Drainage Criteria Manual Volume II or equivalent and be in accordance with good engineering, hydrologic and pollution control practices..."

City Code 7.7.906 B.3. states, "...all sites zoned R estate (residential), R-1 6000 (Single-family residential), R-1 9000 (single-family residential), R-2 (two-family residential) and DFOZ (design flexibility overlay – base zone must be R, R-1 6000 or R-1 9000) that include total development/redevelopment areas of two (2) acres or larger will be reviewed on a case by case basis that will include an assessment of impacts from storm water runoff from the new development to State Waters and a determination of the need for any additional permanent water quality BMPs. Sites for which City Engineering determines water quality impacts to State waters are minimal and permanent

water quality BMPs are impractical will be granted a waiver, based on the submittal of sufficient justification..."

City Code 7.7.906 B. 4. states, "...whenever practical, the City of Colorado Springs promotes permanent storm water quality BMPs on all sites..."

The City Drainage Criteria Manual, Volume 2 has resolution 135-02 which has codified the manual as part of City code requirements. Section 4.1 of the manual states, "All sites zoned R (Estate), E-1 6000, R-1 9000, R-2 and DFOZ, that include total development/redevelopment areas of two (2) acres or larger will be reviewed on a case by case basis that will include an assessment of impacts from stormwater runoff from new development/redevelopment to State Waters and a determination of the need for any additional permanent water quality BMPs. Sites for which City Engineering determines water quality impacts to State Waters are minimal and permanent water quality BMPs are impractical will be granted a waiver, based on the submittal of sufficient justification..."

Corrective Actions:

Provide a written response to the EPA and CDPHE indicating if and how the City intends to address this issue.

Recommendations:

None.

City Response to Corrective Actions:

The City has updated Drainage Criteria Manual Volume 2 to require all new development and redevelopment projects for which construction activities disturb greater than one (1) acre to implement permanent BMPs. The residential waiver for certain residential zoning designations is no longer applicable. The City will also update City Code to reflect this change.

Finding 2CS – Neither the City nor the Developer of Flying Horse Pond Filing 26 Were Maintaining the Pond as Required in the Permit and Private Construction Procedures Allowed for the Potential of Post-Construction Control Maintenance to be Overlooked.

During the inspection, neither the City nor the developer of the Flying Horse Pond Filing 26 was aware of the maintenance status of the pond and who had maintenance responsibility. Discussions revealed that no one had been maintaining the pond. Representatives from the City explained that the developer was responsible for constructing the pond and maintaining it. After a portion of the development draining into the pond was completed, the developer could apply for a probationary inspection, after which the City could inspect the pond and then authorize a 2-year probationary period. During the 2-year probationary period, financial assurances would be reduced and maintenance would be performed by the developer until a final inspection of the facility was performed at the end of the 2-year period. Representatives from the City explained that it was incumbent on the developer to request the final inspection that would remove the facility from the probationary period at the end of two years. From that point on, the City would maintain the pond. At the time of the EPA's inspection, the City relied on the developer to contact the City to ask for the probationary period to begin on a particular structure and for the final inspection to end the probationary period. If the developer did not notify the City, there was a risk that the maintenance of the structure could be overlooked (e.g., Flying Horse Pond Filing 26) with no one handling the maintenance. The request for the probationary inspection for the Flying Horse Pond Filing 26 was issued by the developer on February 4, 2008, but neither the developer nor the City initiated the final inspection in February 2010. According to City records, the City had not performed the final inspection of the pond which would release it from the developer's purview and turn it over to the City to maintain. As of February 6,

2013, no one had been maintaining the pond and the representatives of the developer explained that they had not done so for "some time."

A letter from the City to CDPHE dated August 24, 2001, summarized a discussion between the two entities regarding long-term maintenance of post-construction BMPs. Representatives from CDPHE explained that the "Colorado Springs' permit requires the development and enforcement of controls to reduce the discharge of pollutants after construction is complete. It is the Division's determination that long-term maintenance and operation must still be addressed in the City's program. The requirement to implement BMPs without addressing maintenance and operation needs, will not meet the permit requirement to reduce the discharge of pollutants after construction is complete. Therefore, Colorado Springs will be required to address the long-term operation and maintenance of all BMPs required by their permit, not just the ones incorporated into a public drainage facility. At a minimum, an enforceable ordinance should be developed requiring property owners to maintain BMPs, and requirements should be developed for developments to address long-term responsibility for BMP maintenance." During the inspection, this concern did not appear to be addressed adequately.

Permit Requirements:

The CDPHE permit in Part 1(B)(1)(a)(2)(d) states, "Implement and document procedures, including procedures to enforce the requirements to maintain BMPs when necessary, to ensure adequate long-term operation and maintenance of BMPs consistent with the Permittee's program requirements. Any modification to the BMP design shall be documented prior to the modification occurring..."

The CDPHE permit in Part 1(B)(1)(d)(3)(a) states, "The permittee shall document and continue to implement procedures for inspection and enforcement of control measures at construction sites to the extent allowable under State and local law. The required documents shall include the following: procedures to ensure that BMPs are being installed and maintained in accordance with subsection (2), above, the approved plan, and that sediment sources, materials, equipment maintenance areas (including fueling) and other significant sources of pollution have been addressed..."

Corrective Actions:

Provide a written response to the EPA and CDPHE indicating if and how the City intends to address this issue.

Recommendations:

None.

City Response to Corrective Actions:

The City will update its land development procedures to proactively track the construction and maintenance of permanent BMPs such that probationary acceptance and final acceptance are requested of the developer by the City in accordance with the Permit and the land development code. The revised procedure will ensure that permanent (i.e. post-construction) BMPs are properly designed, constructed, and maintained for both private and public installations.

Finding 3CS – The City has Allowed for At Least Two Water Quality Control Structures to be Placed in State Waters

During the inspection, it was observed that the Flying Horse Pond Filing 26 and the First and Main Town Center commercial development water quality control features were likely constructed in State Waters. Discussion with City engineering staff revealed that they place water quality control structures in State waters under certain circumstances. A letter from the City to CDPHE dated August 24, 2001, summarized a discussion between the two entities regarding the placement of water quality control

structures in State Waters. In the letter, representatives from the CDPHE state that "Discharge is defined by the regulation to mean the introduction or addition of a pollutant into State Waters." The letter also states "...it is the EPA's and the Division's interpretation of requirements that BMPs for post construction be placed prior to discharge to State Waters." Furthermore, the letter states, "If the storm water runoff will discharge into a State Water prior to reaching BMPs, including natural drainage ways being utilized by Colorado Springs as part of their MS4, this may be a violation of the Regulation and the City's permit...Colorado Springs' program needs to be clarified to incorporate this requirement, and ensure that all State Waters are addressed."

The First and Main Town Center development drainage report for Filing 16 was received by the City on February 2, 2012. In the water quality section of the drainage report, it was stated that water quality measure for this site were provided within Sand Creek Detention Pond Number 1. In the plan design memorandum, it was stated, "The detention basin located lowest in the Sand Creek Drainage Basin is referred to as Sand Creek Detention Basin Number 1. The detention basin is proposed as a regional detention basin to be located along Sand Creek north of Constitution Avenue...A water quality pool has been proposed for Sand Creek Detention Basin Number 1 to trap sediment." During the inspection, the City provided photos of the detention basin in Sand Creek for on-site review by the EPA inspector.

The Flying Horse Pond Filing 26 also appeared to be located in State Waters. In the development drainage report it was stated, "...water quality features will be provided in the in-line regional detention basin." City representatives explained that "in-line" means in stream.

Permit Requirements:

The CDPHE permit in Part 1(B) states, "The permittee must develop, implement, and enforce a CDPS Stormwater Management Program, in accordance with Part I.B of this permit, designed to reduce the discharge of pollutants from the MS4 to the "maximum extent practicable" (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Colorado Water Quality Control Act (25-8-101 et seq., C.R.S.) and the Colorado Discharge Permit Regulations (61). Implementation of Best Management Practices (BMPs) consistent with the provisions of the CDPS Stormwater Management Program and the other requirements in this permit constitutes compliance with the standard of reducing pollutants to the MEP."

The CDPHE permit in Part II (A)(8) states, "The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has reasonable likelihood of adversely affecting human health or environment."

The City Drainage Criteria Manual, Volume 2 has resolution 135-02 which has codified the manual as part of City code requirements. Section 4.1 of the manual states, "...the intent is water quality capture volume facilities be located prior to the storm water runoff being discharged to State Waters." Section 2.0 of the manual also states, "...storm water runoff quality can have significant impacts on the receiving waters that affect not only the aquatic ecosystem, but also the quality of our communities."

Corrective Actions:

Provide a written response to the EPA and CDPHE indicating if and how the City intends to address this issue.

Recommendations:

None.

City Response to Corrective Actions:

The City's revised Drainage Criteria Manual Volume 2 (DCM) strongly encourages offline water quality ponds to ensure that water quality is obtained before stormwater runoff reaches State Waters. Although the DCM permits the use of online water quality facilities, these facilities must be designed to

capture and treat all of the site runoff as well as the runoff from the entire upstream basin using fully developed conditions. Online water quality facilities are "...only recommended if the offsite watershed has less impervious area than that of the onsite watershed." Furthermore, the DCM states "...when water quality BMPs are constructed in 'Waters of the State', they must be accompanied by upstream treatment controls and source controls."

As the City updates and revises its drainage basin planning studies (master plans for each watershed), the focus of water quality capture volume will be to treat runoff on a sub-watershed basis, before runoff reaches waters of the state. In some cases, fees have already been collected from developers for on-line water quality ponds, and development itself has precluded any possibility of providing water quality upstream of State Waters. In these cases, upstream treatment controls and source controls will be mandatory to meet the requirements of the Permit.

Finding 4CS – The City Does Not Appear to Implement the Four-step Process Listed in its Drainage Criteria Manual, Volume 2, Which Includes Run-off Reduction Practices, Stabilizing Drainage Ways, Providing Water Quality Capture Volume and Considering the Need for Industrial and Commercial BMPs.

During the inspection, it did not appear that the City was following the four-step process as described in its Drainage Criteria Manual, Volume 2. For example, extreme channel erosion was observed downstream from the Flying Horse Pond Filing 26, along Monument Branch. The erosion was observed by inspectors south of the TCA school (see photos 17 to 24 of the Construction Oversight photo log). Along Monument Branch, there were limited areas of riprap and there was an area that had a destroyed erosion control blanket. In addition, water quality capture volume was not being considered and implemented on all sites. For example, the sites with the residential waivers did not account for water quality capture volume.

Permit Requirements:

The City Drainage Criteria Manual, Volume 2 has resolution 135-02 which has codified the manual as part of City code requirements. Section 4.1 of the manual states, "...This chapter contains guidance and requirements for the selection and siting of structural BMPs for new development and significant redevelopment. The guidance is provided within the context of the four-step process to be followed for new site development and significant redevelopments: Step 1 – employ runoff reduction practices, Step 2 – stabilize drainage ways, Step 3 – provide water quality capture volume, Step 4 – consider the need for industrial and commercial BMPs."

Corrective Actions:

Provide a written response to the EPA and CDPHE indicating if and how the City intends to address this issue.

Recommendations:

None.

City Response to Corrective Actions:

The City's Four-Step Process to Minimize Adverse Impacts of Urbanization, as included in the Stormwater Management and Planning Section of the DCM, Volume 2, is intended to minimize the impacts of smaller, more frequent storm events as a tool to achieve MS4 permit requirements. Although this comment addresses overarching stormwater quality issues, and belongs in the Post-Construction/New Development/Re-development Program Review findings, the City recognizes the importance of implementing the Four-Step Process. Many adverse impacts to the drainageways within the City's MS4, however, are a result of larger storm events beyond the scope of water quality BMPs,

highly erosive soils, steep terrain, and a limited overall implementation period (~10 years) for the program.

Although multiple influences contribute to the eroded status of the City's drainage system, the City acknowledges that improvements to the stormwater program are desirable to ensure MS4 permit compliance and to reflect environmental stewardship. The City strongly encourages runoff reduction practices, especially in new development areas where land is available to accommodate runoff reduction BMPs, and attempts to convince developers that minimizing directly connected impervious areas will enhance water quality. The City requires treatment of the Water Quality Capture Volume and stabilization of drainageways (Steps 2 and 3), and encourages developers to implement BMPs that provide specific removal of pollutants that might be associated with certain types of development (i.e. gas stations, car washes, and others). The City has enough re-development sites in high- and medium-density areas that have never provided water quantity or quality BMPs to make future implementation of water quantity/quality BMPs beyond practicality for those sites. Although the City cannot reasonably require re-development sites to incorporate the four-step process, the City will work with owners of re-development sites to provide WQCV and other water quality components on a sub-regional basis. The revised DCM provides the City with a new, more specific platform from which to enforce regulations.

POST-CONSTRUCTION: NEW DEVELOPMENT/RE-DEVELOPMENT PROGRAM (ND) REVIEW FINDINGS

Finding 1ND – Extended Detention Basin (EDB) Required Design Elements Not Being Implemented

Required design elements for extended detention basins were not being implemented as outlined in the City Drainage Criteria Manual, Volume 2. These design elements were necessary to achieve efficient pollutant removal and included a presedimentation forebay, inlet pipe, top stage, bottom stage, low flow channel and outlet with trash rack.

During the inspection, a representative from the City engineering group responsible for reviewing development plans confirmed that a "good portion" of the EDBs serving the MS4 did not meet the specification criteria outlined in Volume 2. The City allowed for flexibility with the design specifications of EDBs. If elevation or limited parcel size limited the ability to implement an EDB according to specifications, the City engineering group did not require the addition of other BMPs to provide for equivalent treatment.

Permit Requirements:

The CDPHE permit in Part 1(B) (1)(a)(2) states, "The permittee must implement and enforce a program to address stormwater runoff from projects for which construction activities disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts. Minimum technical requirements for required structural BMPs shall be documented and be based on those specified in the Drainage Criteria Manual Volume II or equivalent and be in accordance with good engineering, hydrologic and pollution control practices; use an ordinance or other regulatory mechanism to address post-construction runoff from projects and to implement the requirements of this section, I.B.1.a(2), to the extent allowable under State or local law; implement and document procedures to determine if the BMPs required under Item (a), above, are designed and installed in accordance with program requirements..."

City Code 7.7. 1504.A. states, "...Erosion and storm water quality control plans shall require the design, implementation and maintenance of BMPs as set forth in the most recent version of the Drainage

Criteria Manual, Volume 2: Stormwater Quality Policies, Procedures And Best Management Practices, and shall include plan elements as set forth in the manual..."

City Code 7.7. 1505. States, "Any land disturbance by any owner, developer, builder, contractor or other person shall comply with the basic grading, erosion and storm water quality requirements and general prohibitions as listed below. In many cases, this will require the design, implementation and maintenance of BMPs as specified in the manual, even if an erosion and stormwater quality control plan is not required..."

The City Drainage Criteria Manual, Volume 2 has resolution 135-02 which has codified the manual as part of City code requirements. Section 4.2 of the manual has EDB specification drawings and design forms that require "...a presedimentation forebay, inlet pipe, top stage, bottom stage, low flow channel, and outlet with trash rack..."

Corrective Actions:

Provide a written response to the EPA and CDPHE indicating if and how the City intends to address this issue.

In addition to the response for Findings 1CS, 3CS, 4CS and 1ND, please provide the EPA with a summary (in spreadsheet form) of the land development applications, greater than 1 acre, that the City approved after 2009 for entities for which the City is responsible for providing oversight, with the following information: project size and location; the date of project approval; the presence or absence of permanent water quality BMPs; types of BMPs present; and written justification and final calculations for any waivers exempting permanent water quality feature requirements, if a waiver has been granted. For any permanent water quality BMPs that have been placed within State Waters or that allow for a discharge into State Waters prior to reaching the BMP, the response should include site photographs of current site conditions for all permanent water quality BMPs, a design summary of the water quality BMPs (including outfall design, water quality capture volume and any additional information as appropriate to describe the pollutant removal components for the BMP implemented) and the current maintenance status of the water quality BMPs (by specifically reporting if they "need maintenance" or providing the most recent date of maintenance).

Recommendations:

None.

City Response to Corrective Actions:

The City has begun the work necessary to compile a spreadsheet summary of the land development projects larger than 1 acre that were approved after 2009 for which the City provided or is providing oversight. The City acknowledges that components of certain water quality BMPs were waived or otherwise omitted with certain land development projects, but strives to incorporate BMPs in all development projects as a steward of our environment. Lately, the City has struggled through several reorganizations that have impacted the stormwater program, but has tried very hard to ensure that BMPs are required, designed, constructed, and properly maintained. The City will review the current practices for granting waivers and variances for BMP components, and revise to comply with permit requirements.

Finding 2ND – Repeat Violations of BMPs on New Construction Sites Have Not Been Escalated in Accordance With the Permit or Internal Enforcement Procedures in a Manner to Achieve Compliance with Permit Requirements

Standard operating procedures titled *Colorado Springs Stormwater Inspector Enforcement Guide* outline necessary enforcement steps to be taken by City staff. The first page of this guide outlines the

enforcement steps that should be taken when erosion and sediment control BMPs were not installed or maintained appropriately. The first step was a verbal notice reflecting the violations found during a routine inspection. The second step was a verbal notice during a follow-up inspection, which should be done approximately two business days following the routine inspection. Next, a letter of non-compliance is issued if deficiencies were not repaired after the routine and first follow-up inspections. The deficiencies were to be repaired immediately following the receipt of the noncompliance letter, with City staff returning to the site for a second follow-up inspection within approximately two business days. Subsequently, a stop work order "can be" issued when the deficiencies listed in the letter of noncompliance have not been completed. Additionally, this step explains that "if the deficiencies are not completed during the stop work order and within the timeframe allowed, a demand of the financial assurance is done so the City of Colorado Springs can complete the work." A permit revocation is issued if the developer fails to comply with the stop work order and the owner must resubmit a Grading Plan or Erosion and Stormwater Quality Control Plan. A notice and Order is issued if the City needs to collect funds to abate the violation. Finally, a municipal summons is used when the developer has failed to comply with the stop work order or notice of permit revocation and order.

During inspection discussions and upon review of the enforcement database, it was evident that the City did not follow enforcement steps in a timely fashion as outlined in its own internal procedures and as required in the Permit as well as in City code.

The Villa Mirage development was found to have noncompliance issues associated with inadequate silt fencing dating back to November 25, 2008. City inspectors continued to document failure to properly implement BMPs according to erosion and sediment control plans. On April 28, 2009, a noncompliance letter was issued in response to CDPHE's audit findings noting that the outlined enforcement steps were not being followed and escalated appropriately. On May 15, 2009, another CDPHE audit expressed the need for the City to escalate enforcement on the same developer for the same problems, so the City issued a second noncompliance letter. From May 27, 2009, through July16, 2009, continued violations were found at the site. On July 16, 2009, an off-site release of sediment was documented by City inspectors. On July 28, 2009, a stop work order was issued. Finally on September 28, 2009, a notice revoking the permit and order was issued. The City continued to inspect the site and found the same violations. As of February 2013, the site remained unstabilized and more than four years had elapsed since the start of a trend of noncompliance at the site. In addition, financial assurance was not acquired by the City for the Villa Mirage development during the planning process, as required by City procedures, and the City has not stabilized the site. The City has taken more than four years to address the Villa Mirage development findings. As of February 7, 2013, the site was still not in compliance.

Beginning November 19, 2007, City inspections of North Dublin Filing Number 1 development revealed failure to properly implement BMPs according to erosion and sediment control plans. After continued noncompliance findings by City inspectors, a letter of noncompliance was issued March 24, 2009. On April 28, 2009, City inspectors required management to authorize a stop work order due to continued non-compliance. City management agreed to issue a stop work order September 9, 2009. City inspectors continued to document site noncompliance, and on November 6, 2010, a notice to revoke the permit and associated order was issued. Using financial assurance money, contractors for the City fixed the site on February 22, 2011. The City took more than three years to bring the site into compliance.

At the Falcon Terrace at Springs Ranch Filing Number 1 development, City inspectors identified repeat BMP violations, according to erosion and sediment control plans. According to a series of inspection reports housed in the City's database, BMP violations were documented for this development from August 30, 2012 through February 1, 2013. It did not appear that the City had escalated the enforcement steps as outlined in its internal procedures. Instead, it appeared that the violations were documented during each site visit and discussed with the developer on a routine basis; however, the same types of violations were found during the follow up inspections.

Permit Requirements:

The CDPHE permit in Part 1(B)(1)(d)(3) states, "...The permittee shall document and continue to implement procedures for inspection and enforcement of control measures at construction sites to the extent allowable under State and local law. The required documents shall include the following: enforcement provisions to ensure compliance with requirements as defined in CCS ordinances and rules and approved plans, and to ensure effective operation and maintenance of BMPs. Procedures must include specific processes and sanctions to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures..."

City Code 7.7. 1508 states, "...whenever the City Engineer has inspected or caused to be inspected any grading or land disturbance and has declared a nuisance to the public health, safety and welfare or if the City Engineer has determined noncompliance with this part, the City Engineer shall cause enforcement measures and/or other remedies to be undertaken..."

City Code 7.7. 1509 states, "...the City Engineer shall have enforcement measures and remedies, including but not limited to those listed below, available with respect to declaring a nuisance to the public health safety and welfare or determining noncompliance of this part..."

The City Drainage Criteria Manual, Volume 2 has resolution 135-02 which has codified the manual as part of City code requirements. Section 3.5 of the manual states, "...there are several situations where the City may determine that more aggressive action is necessary to get the site into compliance with its permit...Another instance that may result in more aggressive action is when the history of the contractor/owner/developer suggests that a more formal action is necessary. Problems that may warrant such action include: where the same problem is reoccurring at the site; where the site appears to be having frequent minor problems; or the individuals involved have a history of noncompliance. There are several options for formal action that are available to the City. Table CS-1 summarized some of the more common options that include letter of noncompliance, stop work order, permit revocation, notice and order, municipal summons."

Corrective Actions:

Provide a written response to the EPA and CDPHE indicating if and how the City intends to address this issue.

Recommendations:

None.

City Response to Corrective Actions:

The City acknowledges that, in several instances, enforcement procedures were not followed with respect to the timelines mandated by the MS4 Permit because of staff turnover, morale issues, and a stagnant economy. New stormwater program leadership will highlight the need to follow through with the inspection process and to ensure that the City secures adequate financial collateral in the event that BMPs need to be installed by the City because the developer is unable to do so.

INDUSTRIAL FACILITIES (IF) PROGRAM REVIEW FINDINGS

Finding 1IF – Inadequate Industrial Facilities Program Plan Implementation

During the inspection one of seven facilities, visited by Jeff Besse, Stormwater Specialist in the Department of Public Works Engineering, and an EPA inspector to evaluate the City's Industrial/Commercial education and outreach, was not aware of the City's auto repair program. The EPA inspector visited the following facilities to gauge the City's outreach:

- AutoTech Plaza (409 W. Filmore)
- Advanced Auto Parts (2930 W. Filmore)
- O'Reiley Auto Parts (433 E. Filmore)
- Jiffy Lube (3003 N. Nevada)
- Jiffy Lube (201 S. Nevada)
- Goodyear Tire and Service (125 S. Nevada)
- O'Reiley Auto Parts (141 E. Old Broadmoor Road)

Only the Goodyear Tire and Service's manager was unaware of the City's program. The manager also seemed unaware of the requirements to protect stormwater related to how to respond to major spills at the site. Mr. Besse explained the requirements and provided the manager with a copy of the City's commercial oil outreach material.

Permit Requirements:

Part 1.B.1 of the Permit effective 11/01/11 – 10/31/16 states, "The permittee shall continue to implement a program to promote proper management of industrial sites regarding stormwater quality and industrial best management practices. The program shall provide education and outreach on pollutants in stormwater discharges to municipal systems from industrial facilities that the permittee determines are contributing or have the potential to contribute a substantial pollutant loading to the municipal storm sewer system."

In the City's Industrial Facilities Program document, dated August 26, 2005, it states that the City is targeting "Industrial and commercial businesses in CCS" for education and outreach. The program document states that the City will conduct a mailing to the following industrial facilities once per permit term: concrete, auto repair, and carpet cleaners.

Corrective Actions:

Implement the approved "Industrial Facilities Program" plan for industrial facility education/outreach activities to auto repair facilities as outlined in the City's current plan. Provide the EPA and the CDPHE with a summary, including a timeline, of how the City intends to comply with its current plan, or revise it.

Recommendations:

Review and amend the City's "Industrial Facilities Program" plan to accurately reflect the implementation of the City's program for industrial facility education/outreach (i.e., the addition of auto detailing, washing, etc.)

The Colorado Water Quality Control Act, Section 25-8-501, was designed to protect the State waters by requiring a permit for the discharge of a pollutant into State waters. The City's ordinances prohibit polluted waters from being discharged into the storm sewer system. Both prohibit unpermitted stormwater industrial discharges (i.e., polluted waters) from entering the MS4, which discharge into State waters. Regulated and unpermitted industrial activities within the MS4, at a minimum, should be identified by the MS4 to ensure that they have received MS4 education/outreach and that they have obtained a permit from the State. The City should develop a list of industries within the MS4, identify which may need a State Colorado Discharge Permit System (CDPS) permit, who may be contributing pollutants to the City's storm sewer system and ensure that focused outreach is provided to those industries that are identified.

City Response to Corrective Actions and Recommendations:

Currently, the Corrective Action to the City reads: Implement the approved "Industrial Facilities Program" plan for industrial facility education/outreach activities to auto repair facilities as outlined in the City's current plan. Provide the EPA and the CDPHE with a summary, including a timeline, of how the City intends to comply with its current plan, or revise it.

After further email correspondence with David Gwisdalla of the EPA, it was determined that the mentioned "auto repair facilities" should be changed to "carpet cleaner industries." The City intends to comply with the MS4 Permit and will mail out and distribute brochures for the carpet cleaning industry.

Finding 2IF – Recommendation for Industrial Facilities Program Implementation

During the inspection, Mr. Besse stated that rather than being sent to the carpet cleaning facilities directly, carpet cleaning facilities were provided information as needed, which was primarily when a company had an issue with IDDE. This was due to the frequency in which the carpet cleaning facilities change owners/operators.

Permit Requirements:

Part I.B.1 of the Permit effective 11/01/11 – 10/31/16 states, "The permittee shall continue to implement a program to promote proper management of industrial sites regarding stormwater quality and industrial best management practices. The program shall provide education and outreach on pollutants in stormwater discharges to municipal systems from industrial facilities that the permittee determines are contributing or have the potential to contribute a substantial pollutant loading to the municipal storm sewer system."

In the City's Industrial Facilities Program document, dated August 26, 2005, the City is targeting education and outreach towards "Industrial and commercial businesses in CCS." The program document states that the City will conduct a mailing to the following industrial facilities: concrete, auto repair, and carpet cleaners once per permit term.

Corrective Actions:

None.

Recommendations:

Within the timeline outlined in the Permit, the City should identify the carpet industries within the MS4. In accordance with the City's Industrial Facilities Program document, the City should mail the outreach materials at least once during the permit term in place of or in addition to providing the materials to only the companies involved in a City response to an IDDE event.

City Response to Recommendations:

The City will create an outreach brochure specifically for the carpet cleaning industry. Brochures will be distributed annually to carpet cleaners in the City. Each year, all carpet cleaners in the City will be contacted to confirm that they are still in business. Brochures will then be distributed accordingly.

POLLUTION PREVENTION (PP)/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS PROGRAM REVIEW FINDINGS

Finding 1PP – Update Municipal Facilities Runoff Control Plan (MFRCP)

The City maintained a MFRCP for each municipal facility. During the inspection, the EPA reviewed 11 of the 42 facilities with an emphasis on evaluating the implementation of the MFRCP based upon

department ownership, complexity of the site and proximity to surface water. The photographs provided for this finding can be found in the C. Springs MS4 P2 Photo Log (COS00004). The EPA reviewed the following sites:

Parks and Recreation. Patty Jewett Golf Course Maintenance Facility (1150 E. Caramillo Ave.)
During the inspection of the Patty Jewett Golf Course Maintenance Facility, the site and its relevant best management practices (BMPs) appeared to be installed and well maintained. The only issue noted was that the floor dry used to cleanup spilled fuel at the site was normally stored in a red container adjacent to the fueling area (photo 663); this container was empty during the inspection. According to site staff, during the winter, the facility stored the floor dry in a separate container indoors to prevent it from freezing. No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.

Streets, Briargate Service Center (2385 Briargate Blvd.)
The site appeared to have been recently maintained (photo 664) and was overall in good condition. The site had minor staining under equipment parking areas. Discharge point number six (DP6) had a permanent BMP installed (a large grate inlet) with hay bale protection to reduce sediment from going into the inlet (photo 665). At DP6, below the outlet, rock and soil staining from what appeared to be salt was evident (photo 666). No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.

CSU, Pinkerton Service Center (7710 Durant Dr.)
The site was in good condition in relation to its MFRCP. Three items related to material storage, equipment storage and good housekeeping were noted during the inspection. The site was storing outdoors "Trans Guard Hydraulic Tract Fluid", whereby the material was spilled or dripping causing staining of the soil and retaining wall (photos 667 to 669). While a large number of vehicles and equipment were stored at the site, oil/fuel staining at the parking locations was minimal. However, one piece of equipment was observed as leaking during the inspection (photos 670 and 671). The fueling island's spill kit dry absorbent was noted as empty (photos 672 and 673). No other concerns were noted with the facility in relation to the site's implementation of the MFRCP. On February 14, 2013, photographic evidence was provided by the City illustrating the spill kit dry absorbent containers were now filled.

Police Impound (2725 E. Las Vegas S1.)
The site was in good condition in relation to its MFRCP. Minor staining on the pervious gravel lot was noted. The site administrator noted that drip pans were not used, however containment around the vehicle was used when necessary (no such containment was observed during the inspection). The sedimentation pond was used for the site. Erosion rills were noted in the areas draining to the pond. The pond had approximately seven to ten inches of sediment in it and was noted as needing maintenance (photo 675). The storm sewer leading to the sedimentation pond also had sediment and trash/debris in it (photo 676). The EPA inspector noted that drip pans for leaking vehicles were additional BMPs that may assist the site, vice secondary containment around leaking vehicles, if oils and grease were noted in the sedimentation pond during rain events. No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.

Streets, Outwest Complex (3640 Outwest Dr.)
The site was in good condition. Minor staining at the deicing loading/off-loading area was noted. No other concerns were noted at the site.

Streets, Hancock Depository (1845 Hancock Dr.)
The site was in good condition. No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.

CSU, Leon Young Service Center (1521 Hancock Dr.)
The site was in good condition in relation to its MFRCP. The only issue observed during the

inspection was that one of the site's dumpster lids was open and should be closed (photo 677). No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.

Parks and Recreation, Central Mechanics (1417 Recreation Way)
Overall the facility was in good condition in relation to its MFRCP however, a few items of concern were noted by the EPA inspector. The site's discharge point number three (DP#3) was noted on the site map but the inlet had some leaves, trash and debris in it. The inlet also had a small, four to six inch polyvinyl chloride (PVC) pipe discharging into it. The pipe was reportedly from an inlet near building 1413 (Welding Shop), which was filled with leaves (photos 678 and 679). The connectivity of the pipe and the discharge point were not illustrated on the site map. The site also has a wash rack for equipment that was washed outdoors on a wash pad (photo 680). The site's MFRCP administrator was not aware of where the washwater would ultimately discharge and it was not noted on the facility's site map. The site does not list Quickcrete concrete as a potential pollutant source. During the inspection, material was noted as being stored in a building and appeared to have been spilled outdoors. Evidence of the material was on the ground adjacent to the loading area and a gray discoloration was observed on the soil for a number of feet until it ran underneath a shipping container (photos 681 to 691).

Fleet, CSU, Streets, and Traffic Engineering facility at the Fontanero Service Center (400 W. Fontanero Dr.)
Four separate departments have operations at the Fontanero Service Center which are covered under four separate MFRCPs. The Fleet MFRCP administrator was present during the inspection and was requested to conduct and document the inspection of the Fleet area. During the inspection, the Fleet MFRCP administrator noted the discharge locations, the inlets, the locations of potential pollutants and the status of the required BMPs (secondary containment, floor dry, waste management); see photos (photos 692 and 693). The Fleet site administrator documented the inspection. During the inspection of the Fleet portion of the site, one issue of note was addressed by the site during the inspection. A CSU owned dump-truck was noted as leaking oil (photo 694). The truck was moved to a leaking vehicle storage area and a drip pan placed under it. No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.
Other areas owned and operated by the CCS Street Division, CSU and the Traffic Engineering Department were also inspected by the EPA inspector. On the north side of the Traffic Engineering facility, poor housekeeping of fuels and oils (photo 695) was observed. The facility supervisor was notified and stated that he would address the issue. The EPA inspector asked for photo documentation illustrating it was corrected. A photo of the site, taken on February 8, 2013, was provided to the EPA on February 11, 2013 illustrating that the issue was corrected. No other concerns were noted with the facility related to the site's implementation of the MFRCP.
At the CSU Facilities Building 456 (at 416 Fontanero), on the southeast side of the facility, an inlet with two grates was missing a BMP over one of the inlets (photo 696). The inlet protection shown in the photo was not on the site map, it was reportedly left over from when the facility was being constructed. The remaining BMP had not failed but, rather than disposing of it, it was left in place. The other BMP was removed because it was no longer serviceable. No other concerns were noted with the facility in relation to the site's implementation of the MFRCP.

Permit Requirements:
Part I.B.I.e.2.a of the Permit effective 11/01/11-10/31/16 states, "The permittee shall continue to document and implement Municipal Facility Runoff Control Plans (MFRCPs) for the following permittee-owned and/or operated facilities that do not have independent CDPS Stormwater permits. New MFRCPs shall be developed for any new qualifying facilities. Facilities may be grouped together by type, and one MFRCP may be developed for each group.

i) vehicle maintenance facilities (maintenance includes equipment rehabilitation, mechanical repairs, painting, fueling and lubrication);

ii) asphalt and concrete batch plants which are not already individually permitted;

iii) solid-waste transfer stations;
iv) exposed stockpiles of materials, including stockpiles of road deicing salt, salt and sand, sand, rotomill material."

Part I.B.l.e.2.c.iii of the Permit effective 11/01/11-10/31/16 requires the MFRCP to include a "Description of the potential pollutant sources include an evaluation of that potential..." for each site.

Part I.C 3.a of the Permit effective 11/01/11-10/31/16 requires that "The approved Programs shall not be modified by the permittee without the prior approval of the Division."

Corrective Actions:
Update the Parks and Recreation's Central Mechanics Facility MFRCP (1417 Recreation Way). The MFRCP should include the concrete material use/storage as a potential pollutant source and the pertinent BMPs. For clarity, the MFRCP shall also include an updated site map to address connectivity of discharge point number three (DP#3) and the ultimate sewer discharge of the site's equipment washwater. Provide the EPA and CDPHE with an amended version of the site's MFRCP (including site map(s)).

Provide photo documentation for the following issues observed during the inspection and a date when they were addressed at the CSU, Pinkerton Service Center (7710 Durant Dr.):

1. The "TransGuard Hydraulic Tract Fluid" spill (photos 667 to 669).

2. The leaking/dripping equipment observed during the inspection (photos 670 and 671).
Provide a copy of the finalized complete inspection report for the Fleet Management's inspection of the Fontanero Service Center on February 6, 2013 performed with the EPA inspector. As discussed during the inspection with the EPA inspector, shall not be included on the inspection checklist that would not typically be included in an inspection at this time of the year (e.g., funding expenditures).
Provide a copy of the work order for the Police Impound (2725 E. Las Vegas St.) lot sedimentation pond's required maintenance. Also provide the City's proposed timeline for maintenance at the sedimentation pond.

Provide all of the documentation requested above to the EPA and CDPHE for review.

Recommendations:
Ensure that the City seeks authorization to modify the MFRCP(s) as required by the Permit.
The City should evaluate its procedures to reduce the discharge of salt from site activities at the Briargate Service Center (2385 Briargate Blvd.). While the site appeared to be in good condition, discharge point number six (DP6), had evidence of salt staining downstream of DP6.

City Response to Corrective Actions and Recommendations:

The Parks and Recreation Central Mechanics Facility MFRCP has been updated (Attachment 1) to include connectivity between inlets and outfalls, to show the sewer discharge of the site's equipment washwater system, and to reference the concrete storage. A map and site plan is included (Attachment 2). The City will submit the revised MFRCP to CDPHE for review and approval by the end of July, 2013.

In addition, the requested photos for CSU, Pinkerton Service Center are included to address the following findings:

> *1. Trans Guard Hydraulic Tract Fluid canister was moved to the transformer storage area on February 5, 2013, and was then removed from the site and properly disposed of. On February 6, 2013 the stained soil was dug out and disposed of properly. See Picture 1, below.*

Picture 1 – Stained soil was removed and disposed of properly

2. Spill was covered with floor dry. After the petroleum was absorbed by the floor dry, used absorbent was swept up and disposed of properly (see Pictures 2 and 3).

Picture 2 – Petroleum spill, 02/05/2013

Picture 3 – Petroleum spill covered with floor dry, 02/05/2013

3. The spill kit dry absorbent containers were filled on February 6, 2013 (see Picture 4).

Picture 4 – Filled floor dry container, 02/06/2013

Also included is a copy of the finalized inspection report for the Fleet Management's inspection of the Fontanero Service Center on February 6, 2013 which was performed with the EPA inspector (Attachment 3).

Finally, the sedimentation pond at the Police Impound Lot was cleaned out recently and will be inspected annually and dredged when necessary (Attachment 4). The City will review the SOP for the Briargate Service Center for specific means of reducing salt discharge from site activities.

Finding: 2PP - Inadequate Operations and Maintenance Procedures

The City did not implement the operations and maintenance procedures developed in compliance with the MS4 permit at facilities with an existing industrial stormwater permit. The City staff stated that an industrial stormwater permit for a facility covered the entire facility. Therefore, the MS4 program's operations and maintenance procedures were not required to cover them. This is contrary to the scope of the industrial stormwater general permit. The industrial stormwater permits are designed to regulate only industrial activities and do not permit other operations and maintenance (O&M) related activities conducted by the City staff if they are not covered as a regulated industrial activity.

The City maintains the following NPDES related industrial stormwater permits:

- Colorado Springs Airport (COR341602), 7770 Milton E. Proby Pkwy, Suite 50, Sand and Gravel Permit Stormwater Permit

- Sand Creek Recycling Center (COR341241), 3890 Colorado State Hwy 85-87 South, Sand and Gravel Permit Stormwater Permit

- Las Vegas Street WWTF (COR090069), 703 E. Las Vegas St., Stormwater Industrial Permit

- Drake Power Plant (COR090551), 700 S. Conejos St., Stormwater Industrial Permit

- Birdsall Power Plant (COR090552), 213 Nichols Blvd., Stormwater Industrial Permit

• Transit Maintenance & Storage Facility (COR009016), 1145 Transit Dr., Stormwater Industrial Permit

• Colorado Springs Airport (COR900730), 7770 Milton E. Proby Pkwy., Suite 50, Stormwater Industrial Permit

As an example, the City of Colorado Springs Airport's 2012 stormwater certification statement for its general permit coverage under the Stormwater Discharges Associated with Industrial Activities (Colorado Permit Number: COR900000) described the activities covered by the industrial permit. The certification statement dated June 27, 2012, for the industrial activities under standard industry classification (SIC) code: 4581 covered by the general permit included, "Operation of de-icing fluid collection system. Operation and maintenance of vehicles and equipment for sweeping, plowing, snow and ice removal, maintenance, act. of runways, taxiways, and aprons." Per the City staff, the recently developed O&M SOPs for City activities (e.g., the SOP for "Power Washing") were not believed to be applicable to airport activities since there was a NPDES stormwater industrial permit covering the site. Only in cases where an activity is conducted as part of a covered industrial activity (e.g., outdoor material storage supporting air transportation activities) does the industrial permit cover that activity. Storage of materials for regulated activity in a non-industrial operations area (e.g., landside operations) would require implementation of the City's O&M SOPs at that site, or a separate MFCRP (if appropriate).

Permit Requirements:

Part I.B.I.e.1 of the Permit effective 11/01/11-10/31/16 states, "The program must include a list of facilities the permittee owns or operates that are subject to separate coverage under CDPS permits for discharges of stormwater associated with industrial activity. The requirements of subsection (2) and (3), below, do not apply to stormwater discharges authorized by these separate permits."

The CDPS Permit No. COR900000, Part I.A.l.a.i, allowable discharges states, "Stormwater discharges associated with industrial activity for any primary industrial activities and co-located industrial activities, as defined in Appendix C (Definitions and Abbreviations) and identified in Appendix A (Facilities and Activities covered)..."

The CDPS Permit No. COR900000, Appendix C, for Stormwater Discharges Associated with Industrial Activity states, "... the discharge from any conveyance that is used for collecting and conveying stormwater and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. Except for the provision of 61.3(2)(c) that addresses construction activities associated with oil and gas operations or facilities, the term does not include discharges from facilities or activities excluded from the NPDES program under 40 CFR Part 122 or the COPS program under Regulation No. 61. For the categories of industries identified in this permit, the term includes, but is not limited to, stormwater discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater. See 5 CCR 1002-61.3(2)(e)."

The CDPS Permit No. COR900000, Part I.A.1.a.ii, allowable discharges states, "Discharges that are not otherwise required to obtain permit authorization but are commingled with stormwater discharges that are authorized under this permit..."

The CDPS Permit No. COR900000, Part LA.I.a.2.c. limitations on coverage include, "Discharges that are currently covered under an individual permit or an alternative general permit are not eligible for coverage under this permit."

Corrective Actions:
Provide information to the EPA and CDPHE on whether the City's permitted industrial facilities are implementing the required O&M SOPs at these sites for non-industrial, municipally related activities, or if the City will draft a MFRCP covering these sites as required by the Permit.

Recommendations:

None.

City's Response to Corrective Actions:

The City recognizes that certain stormwater management activities are not specifically addressed by the industrial stormwater permits issued to the industrial sites referenced in the Audit Report. Discharges from the City's permitted industrial facilities are covered by various stormwater discharge permits, and each permitted facility has a site-specific Stormwater Management Plan (SWMP) that includes descriptions of practice-based and structural control measures intended to reduce all identified potential pollutants from the site.

The City has created and implemented site specific Operation and Maintenance Standard Operating Procedures (SOPs) to address the non-industrial operations at each industrial site. City and Colorado Springs Utilities staff are responsible for implementation of the site specific SOPs for non-industrial activities. The Airport will reference the City MS4 O&M SOP that apply to any non-industrial activities on the Airport, including street sweeping, municipal parking lots, large outdoor festivals and events, and snow storage. Specific procedures identified in the aforementioned SOPs will be added to the Airport SWMP control measures if applicable to Airport non-industrial activities.

Finally, after further evaluation of the Las Vegas Street WWTF, we have determined that the East Storage Yard is not an industrial activity directly related to the Las Vegas Street WWTF or defined in Section T of COR900000. Although this portion of the site has developed O&M SOPs, the appropriate method of permitting for this activity would be through the City's MFRCP program. Colorado Springs Utilities is actively permitting this area with the City, and will subsequently remove this area's outfall from the CDPS Permit Certification.

Attachment 1

TABLE OF CONTENTS

I. PURPOSE AND OBJECTIVES 1

A. PURPOSE 1
B. OBJECTIVES 1

II. FACILITY DESCRIPTIONS 1

A. FACILITY LOCATIONS 1
B. FACILITY OPERATIONS 2
C. SITE DRAINAGE 2

III. POTENTIAL POLLUTANT SOURCES AND EXISTING BMPS 2

A. EQUIPMENT MAINTENANCE/FUELING OPERATIONS 2
B. TRUCK UNLOADING AND OIL TRANSFERS 3
C. LANDSCAPING ACTIVITIES 3
D. SEDIMENT AND EROSION 3

IV. STORMWATER MANAGEMENT CONTROLS 4

A. STORMWATER MANAGEMENT PLAN CONTACTS 4
B. PREVENTATIVE MAINTENANCE 4
C. HOUSEKEEPING 5
D. SPILL PREVENTION AND RESPONSE PROCEDURES 5
E. BEST MANAGEMENT PRACTICES FOR POLLUTANT SOURCES 5
F. EVALUATION OF NON-STORMWATER DISCHARGES 6
G. EMPLOYEE TRAINING 6
H. BMP IMPLEMENTATION SCHEDULE 7

V. INSPECTION PROCEDURES 7

A. RUNOFF CONTROL PLAN ADMINISTRATOR 7
B. MFRCP COORDINATORS 7

VI. REPORTING AND RECORDKEEPING PROCEDURES 7

C. REPORTING: 7
D. RECOMMENDED RECORDS TO BE KEPT FOR THE PLAN PERIOD: 7

VII. SIGNATURES 8

APPENDIX A 9

- FIGURE 1 – VICINITY MAP 9
- FIGURE 2 – SOUTH AREA SITE MAP 9
- FIGURE 3 – NORTH AREA SITE MAP 9

APPENDIX B 10

APPENDIX C 11

I. PURPOSE AND OBJECTIVES

A. Purpose

The City of Colorado Springs is required under Part 1.B.1.e. of its Municipal Stormwater Discharge Permit (MSDP), Permit No. COS-000004, to develop a Municipal Facility Runoff Control Program (MFRCP). As part of the program, a Runoff Control Plan must be developed and implemented for city-owned and/or - operated facilities having a particular type of operation that is not covered under an existing Colorado Discharge Permit System (CDPS) stormwater permit.

The purpose of a Runoff Control Plan is to prevent or reduce pollutants in stormwater runoff discharging from municipal facilities. The pollutants are reduced through identification of potential pollutants and sources, implementation of recommended "best management practices" (BMPs), and annual compliance inspection of applicable municipal facilities.

Individual Runoff Control Plans are required for all "major" facilities and each group of "minor" facilities. The City of Colorado Springs, Public Works Department, City Engineering Division, Stormwater Drainage Team has overall responsibility for the MFRCP and is responsible for classifying all major and minor facilities. For the purposes of this plan, the Maintenance Shop building and the stockpile yard are considered one facility due to their close proximity and due to both being operated by the City of Colorado Springs, Parks, Recreation, and Cultural Services Department, Urban Parks and Horticulture Division, Facilities Maintenance Team. This facility has been classified as a major facility due to the significant quantity (> 600 cubic yards) of stockpiled material.

B. Objectives

This Runoff Control Plan has two main objectives. The first objective is to identify potential pollutants and sources at the facility that may affect the quality of discharge from the site. The second objective is to identify existing BMPs and any deficiencies, evaluate the pollution potential, and determine additional BMPs needed at the site.

II. FACILITY DESCRIPTIONS

A. Facility Locations

The facility is located in the central portion of Colorado Springs on Recreation Way and is adjacent to Monument Creek. The location is shown in Figure 1 (Vicinity Map) of Appendix A. The following is the facility's address, phone number and facility contact:

Maintenance Shop/Stockpiles
1417 Recreation Way
Colorado Springs, CO 80905
(719) 385-6553
Facility Contact: Mike Rossell

B. Facility Operations

The facility is operated by the City of Colorado Springs, Parks, Recreation, and Cultural Services Department, Urban Parks and Horticulture Division, Facilities Maintenance Team. Facilities Maintenance maintains the City's urban and regional parks. The equipment and materials that are required to accomplish this task are stored at this facility. A site map of the complex is shown in Figures 2 and 3 of Appendix A.

External operations at the stockpile yard and at the Maintenance Shop building consist of stockpiling of maintenance materials, storing of miscellaneous park equipment and supplies, and storing of maintenance equipment. A roll-off dumpster is also located near the stockpiles and is used to collect trash and waste from medians prior to being taken to the landfill (identified as item #7 on Figure 3). Internal operations occur only at the Maintenance Shop building and consist mostly storage and maintenance of equipment and storage of small quantities of fuel and oil.

C. Site Drainage

The facility is located within the Monument Creek drainage basin, which drains to Fountain Creek. The area of the complex that has activities that could potentially impact stormwater and therefore the creek is approximately 0.5 acres. Of this area, the impervious portion consists of the Maintenance Shop building and adjacent paved lot and the pervious portion consists of the stockpile yard.

Drainage on the north side of the Maintenance Shop building drains to a grated inlet that discharges at DP#2. Runoff falling on the concrete pad surrounding the sand trap is conveyed through the sand trap to the sanitary sewer. Flow south of the sand trap is conveyed to a grated inlet that discharges at DP#4.

Drainage flows away from the stockpiles, as shown in Figure 3. Flow conveyed to the east drains under a wooden fence that is flush to the ground. The flow is then conveyed via a vegetated ditch until it discharges into Monument Creek. Drainage at the southern end of the stockpile yard flows to DP#1 (see Figure 2). Drainage flowing west of the stockpiles is conveyed through a sparsely vegetated area along the fence line and then flows along Recreation Way. The flow eventually discharges to Monument Creek. Two additional inlets drain the southern portion of the parking lots which the flow to DP#3.

III. POTENTIAL POLLUTANT SOURCES AND EXISTING BMPs

A. Equipment Maintenance/Fueling Operations

There are no bulk fueling operations at the facility. Parks, Recreation, and Cultural Services Department's vehicles are fueled at Fleet Management Unit fueling locations. The facility, however, does have small quantities of fuel and other petroleum, oil, and lubricant products (POLs) stored in the Maintenance Shop building. These products are used to maintain park equipment (e.g., mowers).

The facility also generates used oil, which is stored in a 560-gallon used oil tank. The tank is located exterior to the Maintenance Shop building and has secondary containment. The used oil system is arranged, however, such that used oil can be dumped into the system from the interior of the Maintenance Shop building and it is piped outside to the tank.

Mowers or other park equipment that comes to Maintenance Shop sometimes requires washing. Washing occurs on a concrete pad exterior to the building. All wash water falling on the concrete pad drains through a sand trap is conveyed to the sanitary sewer. Vehicle washing is performed on-site by a contractor who has a discharge permit for that activity.

The limited quantity of POLs, the indoor storage of POLs and indoor disposal of used oil, the secondary containment of the used oil tank, the use of a concrete wash pad and sand trap, and the onsite availability of spill clean up materials minimizes this as a potential pollutant source.

B. Truck Unloading and Oil Transfers

The used oil tank fills approximately every two years. A contractor comes to the facility and properly disposes of the material. The transfer of used oil is a minimal potential pollutant source.

C. Landscaping Activities

Currently, Facilities Maintenance does not use or store any pesticides or fertilizers at the Maintenance Shop building or at the stockpile yard. Pesticides and fertilizers are used at the adjacent administration building, but this location is not covered by this plan.

In the event that the facility uses or stores pesticides or fertilizers in the future, the facility employees will comply with their Pesticide Control Procedure. The Parks and Recreation Department has adopted a Pesticide Control Procedure that provides guidelines for usage, storage, and disposal of pesticides (including herbicides and all other "cides") and fertilizers regulated under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Guidelines outlined in the Procedure would minimize contaminated stormwater from entering state waters.

The application and storage of fertilizers and pesticides is not currently a potential pollution source.

D. Sediment and Erosion

The stockpiles at the facility are located in a fenced, pervious area. A few concrete bins are used to store material; however, most materials are in open stockpiles and are completely exposed to rainfall and runoff. Materials stockpiled at the site consist of road base material, topsoil, dirt and sand.

Most of the drainage from the stockpiles flows through some vegetation, although in several locations on the west side of the stockpile yard, it is very sparse. The vegetated ditch east of the stockpile yard results in the removal of some of the suspended material that is entrained in discharge from the east side of the yard. Drainage from the southern portion of the yard drains to an inlet without passing through any vegetation or other BMP. The stockpiles are a potential pollutant source.

IV. STORMWATER MANAGEMENT CONTROLS

A. Stormwater Management Plan Contacts

The parks are owned and operated by the City of Colorado Springs. The Runoff Control Plan Administrator and the Facility Contact are the following:

Runoff Control Plan Administrator:
Ms. Kim King
City of Colorado Springs
Parks, Recreation, and Cultural
Services Department
1401 Recreation Way
Colorado Springs, CO 80905-1024
Phone: (719) 385-6509

Facility Contact:
Mr. Mike Rossell
City of Colorado Springs
Parks, Recreation, and Cultural
Services Department
1421 Recreation Way
Colorado Springs, CO 80905
Phone: (719) 385-6553

The Runoff Control Plan Administrator is responsible for assisting in plan development and in plan updates, implementing the plan, notifying the MFRCP Coordinators of facility changes, annually inspecting the facility, reporting on-site plan conformity to the MFRCP Coordinator and recordkeeping. The Facility Contact will assist the Runoff Control Plan Administrator in the above tasks.

The MFRCP Coordinator for the City of Colorado Springs' MSDP is:

Jeffrey R. Besse
Public Works
City of Colorado Springs
EDR/Stormwater
30 S. Nevada Avenue, Suite 401
P.O. Box 1575, Mail Code 410
Colorado Springs, CO 80901-1575
(719) 385-5566

The MFRCP Coordinator is responsible for plan development, conducting annual compliance inspections, reporting to Colorado Department of Public Health and Environment (CDPHE), and maintaining certain records in accordance with the City of Colorado Springs' MSDP.

B. Preventative Maintenance

The following preventative maintenance practices are recommended for the purpose of preventing discharges of pollutants to surface water:

- Stormwater outfalls should be inspected once each year. Inspections should evaluate each outfall's function and condition and for signs of pollutant release. Maintenance shall occur when required. Assistance from the City's Street Division Drainage Maintenance Crew should be sought, as necessary.
- Emergency spill equipment (includes spill absorbent materials) shall continue to be made available at the site.

C. Housekeeping

The following housekeeping practices are recommended for the purpose of ensuring a clean and orderly work environment, thus reducing the potential for stormwater contamination:

- All paved areas exposed to stormwater shall be maintained by using a street sweeper, brooms, shovels or other applicable equipment a minimum of once per month and documented (with date) on facility's Activity Frequency Form. Washing down ground surfaces with water shall be discouraged.
- Windblown waste materials (e.g., plastic sheets and paper) or other discarded materials observed on the lot shall be picked up regularly (a minimum of quarterly) and documented (with date) on facility's Activity Frequency Form.
- The facility shall comply with the Department's Container Control Procedure and shall ensure that all containers are labeled and stored in a manner that will prevent accidental spills. A copy of the Container Control Procedure shall be kept in the Facility Contact's office.
- Inlets and discharge points that become clogged shall be cleaned so that flow can pass through without obstruction. Assistance from the City's Street Division Drainage Maintenance Crew should be sought, as necessary.
- Any power washing conducted on site shall follow the attached state power washing guidelines located in the appendix.

D. Spill Prevention and Response Procedures

The complex does not have a fuel tank, eliminating the requirement for a Spill Prevention Control and Countermeasure (SPCC) Plan. However, any spill of a material which may negatively impact stormwater shall be contained, cleaned up, properly stored and discarded in accordance with applicable procedures (i.e. Material Safety Data Sheets).

In the absence of any procedures, follow the procedures listed below:

- The Colorado Springs Fire Department shall be notified of releases of chemicals that pose a health and safety risk or have a potential to harm the environment.
  - For non-emergency situations, call Colorado Springs Police and Fire dispatcher @ 444-7000.
  - In an emergency, call 911 to report the spill.
- All spills over 5 gallons shall also be reported to the Runoff Control Plan Administrator who will notify the MFRCP Coordinators. Refer to the facility's Spill Procedures for additional notifications that may be required.
- Refer to the appendix for reporting guidelines of spills.

E. Best Management Practices for Pollutant Sources

In addition to any BMPs already being implemented, the following BMPs are recommended:

Equipment Maintenance/Fueling Operations

- Equipment maintenance shall occur inside the Maintenance Shop building if there is any potential for a POL release.
- No POL shall be intentionally poured on the pavement or ground.

- Absorbents and tools for spill cleanup shall continue to be made available.
- All POL spills shall be cleaned up with absorbent material.
- Absorbents, dirt, trash, rags or other solid materials contaminated with any POL product shall be placed in a non-leaking container and properly disposed.

Loading and Unloading

- All leaks shall be contained during transfers and any spills shall be immediately cleaned up.

Sediment and Erosion Control

- The perimeter of the stockpile area shall be walked during the annual inspection to look for signs of sedimentation and erosion.
- Quantities of materials stockpiled shall be minimized based on estimated usage of the materials.
- To assure minimization of runoff-transported material from the stockpiles, one or more of the following BMPS shall be installed/implemented:
  - Concrete bins for stockpiled materials shall be constructed/installed, AND/OR
  - The area along the west fence line (interior) shall be more-heavily vegetated to assure filtering of stormwater-carried sediment, AND/OR
  - Silt fence, straw bales, or a rock filter shall be placed along the west side of the yard where flow exits the lot, AND/OR
  - An asphalt berm shall be installed at the entry to the stockpile area to assure that runoff continues southward within Parks, Recreation, and Cultural Services property until any water-borne sediment drops out before entering inlets or other drainage systems.

F. Evaluation of Non-stormwater Discharges

There was one apparent non-stormwater discharges located on the site during the EPA Audit. It appears that concrete was mixed outside of a contained area and spotting and staining was located in the area. Since that time, the area was cleaned. Plans to build a temporary or permanent berm have been discussed. It was verified from sewer maps that the sand trap overflow discharges to the sanitary sewer. Any identified non-stormwater discharges occurring in the future will be investigated and properly addressed in this plan as needed.

G. Employee Training

The Runoff Control Plan Administrator is responsible for coordinating training for facility personnel who are involved in activities that may impact stormwater runoff. The MFRCP Coordinator will be available to assist with training sessions if arranged in advance. Training will take place annually by **July 1st** and shall include familiarization with this plan, including its location for quick reference. Training shall address identification of possible pollutants and the importance of observing the BMPs described in this plan. Training records shall be kept at the RCP Administrator's office and a copy forwarded to the MFRCP Coordinator.

H. BMP Implementation Schedule

The recommended BMPs in Section IV were initially implemented in 1999. BMP's shall continue to be implemented until the plan is modified based on changed circumstances or operations.

V. INSPECTION PROCEDURES

A. Runoff Control Plan Administrator

The Runoff Control Plan Administrator or designee shall inspect this facility's stormwater management system once per year during dry weather[1]. If so arranged, the inspections can be conducted at the same time as the annual inspection conducted by the MFRCP Coordinators (although the Coordinator must only inspect one representative facility from the group). The inspection form in Appendix B will be used for these inspections. The purpose of the inspections will be to report the overall conformity with the Runoff Control Plan. This inspection must be completed, documented and submitted to City Engineering Division, Stormwater Drainage Team, by **July 15th** of each year.

[1] no precipitation within last 48 hours and no evidence of snowmelt

Deficiencies identified during the inspection should be addressed immediately by the RCP Administrator in coordination with the MFRCP Coordinator. All issues shall be addressed and implemented as specified by the MFRCP Coordinator within 60 days of the inspection or date the deficiency was identified. Confirmation of the correction shall be sent to the MFRCP Coordinator by the 60th day. In some cases, the MFRCP Coordinator may field verify the modifications.

B. MFRCP Coordinators

The MFRCP Coordinator or designee shall inspect the facility once per year. An inspection form developed by the City of Colorado Springs, City Engineering Division, Stormwater Drainage Team, will be used for the inspection. The purpose of the inspection will be to determine compliance with the Runoff Control Plan and the effectiveness of existing BMPs. This MFRCP Coordinator's inspection shall be completed and documented by **September 30th of each year.**

VI. REPORTING AND RECORDKEEPING PROCEDURES

C. Reporting:

- The Runoff Control Plan Administrator shall report the findings of the annual inspection by submitting the original completed inspection form to the City Engineering Division, Stormwater Drainage Team (Mail Code #520, Attn: Tom Repp) by **July 15th of each year.**

D. Recommended records to be kept for the plan period:

- A copy of the Runoff Control Plan to be kept at the Facility Contact's office and at the Runoff Control Plan Administrator's office. A copy also should be on file at the City Engineering Unit, Stormwater Drainage Team.
- The Runoff Control Plan must be submitted to the CDPHE upon request.
- Copies of completed Runoff Control Plan Administrator's inspection forms **(includes labor and O&M costs and backup data)** with completed copies of

Activity Frequency Forms attached. Copies of correspondences pertaining to this site.

- Copies of the attendance list for training to be kept at the Runoff Control Plan Administrator's office and also with the MFRCP Coordinator's files at their office.
- A copy of the facility's Container Control Procedure and Pesticide Control Procedure to be kept at the Facility Contact's office.

VII. SIGNATURES

This Runoff Control Plan has been prepared in fulfillment of the requirements of the Municipal Facility Runoff Control Program required under Part 1.B.1.e of the City of Colorado Springs' Municipal Stormwater Discharge Permit. In addition, other federal and state regulations have been referenced for related management practices.

The purpose of a Runoff Control Plan is to prevent or reduce pollutants in stormwater runoff. The pollutants are reduced through identification of potential pollutants, implementation of recommended BMPs to reduce the pollutants in stormwater discharges and annual inspection of applicable municipal facilities.

The Parks and Recreation Department has designated the Runoff Control Plan Administrator as the person who is responsible for ensuring that this plan is followed. The Facility contacts signing are required to assist the Runoff Control Plan Administrator.

Reviewed and Approved by Runoff Control Plan Administrator:

_____ _____

Kim King Date
Parks, Recreation, and Cultural Services Department
City of Colorado Springs

Reviewed and Approved by the Facility Contact:

_____ _____

Mike Rossell Date
Facilities Maintenance Supervisor
Parks, Recreation, and Cultural Services Department
City of Colorado Springs

Reviewed and Approved by MFRCP Coordinator:

_____ _____

Jeffrey R. Besse Date
Stormwater Specialist City Engineering Division
City of Colorado Springs

APPENDIX A

- FIGURE 1 – VICINITY MAP
- FIGURE 2 – SOUTH AREA SITE MAP
- FIGURE 3 – NORTH AREA SITE MAP

APPENDIX B

Copy Number	Location
Original	MFRCP Coordinator's files – City Engineering
1	Kim King
2	Mike Rossell – Parks Central Maintenance - Active copy to be maintained for inspection and annual submittal.

APPENDIX C

- Inspection Form
- Activity Frequency Forms
- Current Power Washing Guidelines
- Colorado State Guidance for Reporting Spills

Attachment 2

FIGURE #2

SITE MAP

CENTRAL MECHANICS/STOCKPILES SOUTH AREA

1417 Recreation Way

Site Administrator:
Mike Rosell 385-6553

Legend

- Discharge Points
- Inlets
- Fences
- Railroads
- Streets
- Building

Storm Sewer Schematic

Structure

- Pipe
- Swale

\\Dpoc-adssfs02p\Storm_Permit\MFRCP\2012_MFRCP\Parks_&_Rec\Central Mechanics\Central Mechanics-South.mxd

REVISED: JUNE 2013

EDR STORMWATER
30 S. NEVADA AVE. SUITE 401
COLORADO SPRINGS, CO 80901-1575
(719) 385-5980

Attachment 3

ANNUAL COMPREHENSIVE FACILITY INSPECTION

MUNICIPAL FACILITY RUNOFF CONTROL PROGRAM

RUNOFF CONTROL PLAN

Facility: Parks and Recreation Department – Maintenance Shop

Address: 1417 Recreation Way
Colorado Springs, CO 80905

Date Inspected: _____ **Inspected by[1]:** _____

[1] Inspection must be conducted by the Runoff Control Plan Administrator or designee.

PREVENTATIVE MAINTENANCE

Discharge Points

Inspect stormwater discharge points, during dry weather (i.e., no precipitation within last 48 hours and no evidence of snowmelt) for signs of physical deterioration of the outfall, dry weather discharges (any flows, stains, or sludges), sediment build-up, or foreign debris.

DP #1	Deterioration:	Yes ❑ No ❑
	Discharge:	Yes ❑ No ❑
	Sediment:	Yes ❑ No ❑
	Debris:	Yes ❑ No ❑
DP #2	Deterioration:	Yes ❑ No ❑
	Discharge:	Yes ❑ No ❑
	Sediment:	Yes ❑ No ❑
	Debris:	Yes ❑ No ❑
DP #3	Deterioration:	Yes ❑ No ❑
	Discharge:	Yes ❑ No ❑
	Sediment:	Yes ❑ No ❑
	Debris:	Yes ❑ No ❑
DP #4	Deterioration:	Yes ❑ No ❑
	Discharge:	Yes ❑ No ❑
	Sediment:	Yes ❑ No ❑
	Debris:	Yes ❑ No ❑

If you have answered yes to any of the above, use the space below or attach a sheet explaining the reason for the yes answer, what has or will be done to remedy the situation, and dates completed:

_____

Is spill clean up material located on site (e.g., floor dry)? Yes ❑ No ❑

If you have answered NO to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

HOUSEKEEPING

Are all paved areas that have stormwater exposure being maintained by using brooms, street sweepers, shovels, or other applicable equipment monthly? Verify the frequency that the areas were maintained (see the attached activity frequency form). Yes ❑ No ❑

Is windblown waste or other discarded material (e.g., plastic sheets, and paper) picked up at least quarterly? Verify the frequency that the waste was picked up (see the attached activity frequency form). Yes ❑ No ❑

Inspect container storage areas and review the Division's Container Control Procedure. Is the facility in compliance with the Division's Container Control Procedure, is a copy of the procedure at the Facility Contact's office, and are all containers stored in a manner that will prevent accidental spills? Yes ❑ No ❑

At the time of the inspection are the inlets and discharge points clear of obstructions? Yes ❑ No ❑

Are power washing activities followed as noted in the state guideline form attached to the MFRCP? Yes ❑ No ❑

If you have answered NO to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

Have ground surfaces not been washed down with water? Yes ❑ No ❑

If you have answered YES to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

_____

_____

_____

SPILL PREVENTION AND REPONSE PROCEDURES

Has the facility had a release or spill of any chemicals or vehicle fluids since the last inspection? Yes ❑ No ❑

If you have answered YES to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

_____

_____

_____

Is the used oil tank in good operational condition and with no leaks? Yes ❑ No ❑

If you have answered NO to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

_____

_____

_____

Has oil/sand separator been cleaned and frequency form filled out as required? Yes ❑ No ❑

If you have answered NO to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

LANDSCAPE ACTIVITIES

Not applicable

TRAINING

Training programs are required as part of the Runoff Control Plan. Review training records to ensure employees have been properly trained in their areas of responsibility.

Are training records current and complete for those who are involved in activities that may impact stormwater runoff? Yes ❑ No ❑

Are training records located in the Facility Contact's office? Yes ❑ No ❑

If you have answered NO to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

RECORDKEEPING

Plan, training records, inspection forms and frequency forms are to be kept. It is recommended that cost data and correspondence are maintained. Yes ❑ No ❑

Are the SPCC Plan and associated records kept at the Facility Contact's office? Yes ❑ No ❑

Are copies of the Container Control Procedure kept at the Facility Contact's office? Yes ❑ No ❑

If you have answered NO to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

COSTS ASSOCIATED WITH RUNOFF CONTROL PLAN

What *capital* has the facility incurred, within the last year, to comply with this Runoff Control Plan? $ _____ *(examples: cost of materials to construct concrete bins; cost of materials to repair stormwater outfalls and inlets; cost for use of street sweepers at the facility)*

Provide a brief description of these expenditures: _____

What *labor costs and O&M expenditures* has the facility incurred, within the last year, to comply with this Runoff Control Plan? $ _____ *(examples: labor for street sweeping at the facility; labor to conduct inspections and training, construct concrete bins, and maintain stormwater outfalls and inlets)*

Provide a brief description of these costs: _____

OTHER INSPECTION NOTES:

RUNOFF CONTROL PLAN ADMINISTRATOR SIGNATURE

I or my designee have made a thorough and complete inspection of the Parks and Recreation Department property including all parking areas, material handling and storage areas, storm drain inlets and trenches, spill response equipment, and the general grounds with respect to stormwater pollution prevention and for conformance with the MFRCP for this facility, and noted all evidence of, or potential for, pollutants entering the storm drainage system.

Signature: _____ Date: _____
Mike Rossell
Environmental, Safety, & Health Specialist

Signature: _____ Date: _____
Kim King
Environmental, Safety, & Health Specialist

MFRCP RECORDKEEPING REQUIREMENTS

- Send completed original inspection report to City Engineering Unit, Mail Code #410 (Attn: Jeff Besse). Include current year copy the Runoff Control Plan, training records, inspection forms and frequency forms that are kept. It is recommended that cost data and correspondence are maintained and submitted as well.

Attachment 4

ANNUAL COMPREHENSIVE FACILITY INSPECTION

MUNICIPAL FACILITY RUNOFF CONTROL PROGRAM

RUNOFF CONTROL PLAN

Facility: Fleet Management – Fontanero Complex

Address: 404 West Fontanero
Colorado Springs, Colorado 80907

Date Inspected: 08/06/13 - 1:15pm **Inspected by**[1]: Daryl Calvert

[1] Inspection must be conducted by the Runoff Control Plan Administrator or designee.

PREVENTATIVE MAINTENANCE

Discharge Points

Inspect stormwater discharge points, during dry weather (i.e., no precipitation within last 48 hours and no evidence of snowmelt) for signs of physical deterioration of the discharge point, dry weather discharges (any flows, stains, or sludges), sediment build-up, or foreign debris.

DP #1	Deterioration:	Yes O	No ●
	Discharge:	Yes O	No ●
	Sediment:	Yes O	No ●
	Debris:	Yes O	No ●
DP #2	Deterioration:	Yes O	No ●
	Discharge:	Yes O	No ●
	Sediment:	Yes O	No ●
	Debris:	Yes O	No ●
DP #3	Deterioration:	Yes O	No ●
	Discharge:	Yes ●	No O
	Sediment:	Yes O	No ●
	Debris:	Yes O	No ●

If you have answered YES to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

DP3 - Ground water - no sheen

Is there spill clean up material located on site (e.g., floor dry) as required by the spill procedure? Yes ● No ○

If you have answered NO to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

HOUSEKEEPING

Are floor and ground surfaces and all paved areas that have stormwater exposure being maintained by using brooms, street sweepers, shovels, or other applicable equipment at a minimum of 3 times per year and after winter sanding activities? (Verify the frequency that the areas were maintained on the Facility Activity Frequency Form.)	CSU Locations Yes ● No ○
If surfaces, vehicles, or equipment have been washed and discharged to the storm sewer system, have appropriate permits been applied for and appropriate interim BMPs been implemented?	Yes ● No ○
At the time of the inspection are inlets and discharge points clear of obstructions?	Yes ● No ○
Is windblown waste or other discarded material (e.g., plastic sheets, and paper) picked up at least quarterly? (Verify the frequency that the waste was picked up on the Facility Activity Frequency Form.)	CSU Locations Yes ● No ○
Have personal vehicle parking areas been inspected weekly and leaks/stains properly cleaned and eliminated? (Verify the frequency of inspections on the Facility Activity Frequency Form.)	See Attached Form Yes ● No ○
Inspect container storage areas and review the Division's Container Control Procedure. Is the facility in compliance with the Division's Container Control Procedure, is a copy of the Procedure on-site, and are all containers stored in a manner that will prevent accidental spills?	Fleet's Procedures Yes ● No ○
Are powers washing activities followed as noted in the state guideline form attached to the MFRCP?	Yes ● No ○

If you have answered NO to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

Have ground surfaces been washed down with water? Yes o No ●

If you have answered YES to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

SPILL PREVENTION AND REPONSE PROCEDURES

Has the facility had a release or spill since the last inspection of any chemicals or vehicle fluids? Yes o No ●

If you have answered YES to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

Small spill found under U2609 during this inspection, see attached e-mail for more info

Is a copy of the spill procedure on-site? 404. SPCC Plan Yes ● No o

Were state guidelines for spill reporting followed in the plan year? Yes ● No o

If you have answered NO to the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

LANDSCAPE ACTIVITIES

Not applicable

VEHICLE MAINTENANCE/FUELING OPERATIONS

Are signs posted at the fuel dispensers that discourage overtopping? Yes ● No ○

Review the Unit's Hazardous Wastes Control Procedure. Is the facility in compliance with the Fleet Procedure's Procedure and is a copy of the Procedure on-site? Yes ● No ○

Have staff performed daily (business days) inspections of the parking areas for vehicles in for repair/preventative maintenance and recorded any actions taken in a log book/sheet? Yes ● No ○

Have catch basin inserts been installed at downstream, onsite, grated inlets, if any? Yes ● No ○

If you have answered NO to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

SEDIMENT AND EROSION CONTROL

Addressed by housekeeping (above)

TRAINING

Training programs are required as part of the Runoff Control Plan. Review training records to ensure employees have been properly trained in their areas of responsibility.

Are training records current and complete for those who are involved in activities that may impact stormwater runoff? Yes ● No ○

Are training records located at the Runoff Control Plan Administrator's office? Yes ● No ○

If you have answered NO to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

Fleet training records are tracked from Aug to July for MFRCP Inspections. I have included my training records as a sample.

RECORDKEEPING

Plan, training records, inspection forms and frequency forms are to be kept. It is recommended that cost data and correspondence are maintained. Yes ● No O

Are copies of the Container Control Procedure and the Hazardous Waste Control Procedure kept on-site? Fleet Procedures Yes ● No O

If you have answered NO to any of the above, use the space below or attach a sheet and explain. Include what has or will be done to remedy the situation and dates completed:

COSTS ASSOCIATED WITH RUNOFF CONTROL PLAN

What *capital and O&M expenditures* has the facility incurred, within the last year, to comply with this Runoff Control Plan? $ ______________ *(examples: cost of BMPs, such as inserts, spill supplies, etc.; cost for use of street sweepers at facility; costs for material to build berm)*

Provide a brief description of these expenditures: See Attached Form

What *labor costs* has the facility incurred, within the last year, to comply with this Runoff Control Plan? $ _____ *(examples: labor for sweeping of facility; labor to conduct inspections and training; labor to build berm)*

Provide a brief description of these costs: See attached Form

OTHER INSPECTION NOTES:

I have included photos from the August 2012 MFACP Inspection. I have photos of Fleets S/W inlets & outlets along with trash dumpsters on site

RUNOFF CONTROL PLAN ADMINISTRATOR SIGNATURE

I or my designee have made a thorough and complete inspection of the Fleet Management Unit's property including all parking areas, material handling and storage areas, storm drain inlets and trenches, spill response equipment, and the

general grounds with respect to stormwater pollution prevention and for conformance with the MFRCP for this facility, and noted all evidence of, or potential for, pollutants entering the storm drainage system.

Signature: _____ 2/21/13

Tom Monarco - Fontanero — Date

Signature: _____ 2/20/13

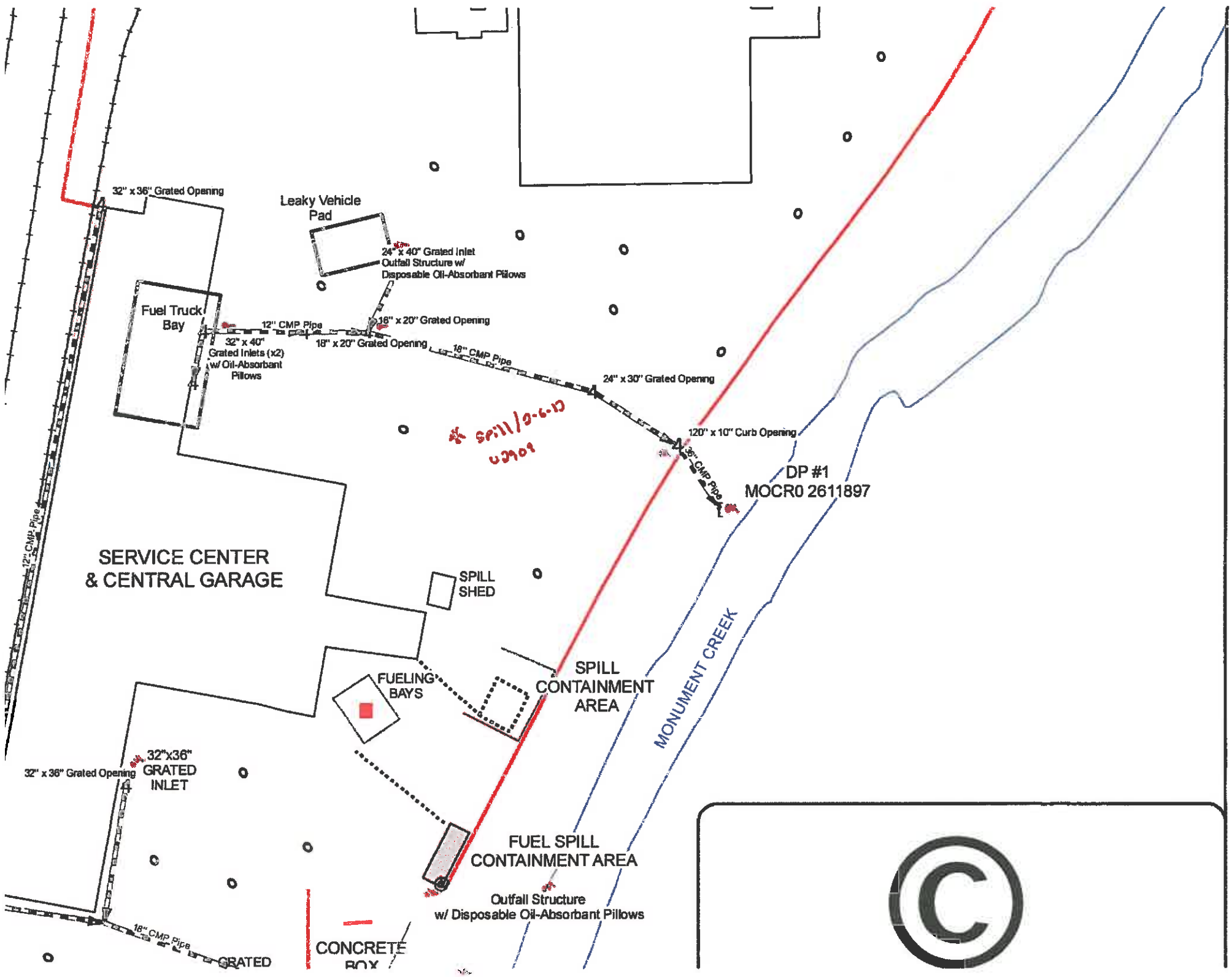
Deryl Calvert - Fontanero — Date

Signature: _____ 2/19/2013

Pono Umiamaka - Fontanero — Date

MFRCP RECORDKEEPING REQUIREMENTS

- Send completed original inspection report to City Engineering Unit, Mail Code #520 (Attn: Thomas Repp). Include current year copy the Runoff Control Plan, training records, inspection forms and frequency forms that are kept. It is recommended that cost data and correspondence are maintained and submitted as well.


32" x 36" Grated Opening
Leaky Vehicle Pad
24" x 40" Grated Inlet Outfall Structure w/ Disposable Oil-Absorbant Pillows
Fuel Truck Bay
12" CMP Pipe
16" x 20" Grated Opening
32" x 40" Grated Inlets (x2) w/ Oil-Absorbant Pillows
18" x 20" Grated Opening
18" CMP Pipe
24" x 30" Grated Opening
120" x 10" Curb Opening
18" CMP Pipe
DP #1
MOCR0 2611897
12" CMP Pipe
SERVICE CENTER & CENTRAL GARAGE
SPILL SHED
FUELING BAYS
SPILL CONTAINMENT AREA
MONUMENT CREEK
32" x 36" Grated Opening
32"x36" GRATED INLET
FUEL SPILL CONTAINMENT AREA
Outfall Structure w/ Disposable Oil-Absorbant Pillows
18" CMP Pipe
GRATED
CONCRETE

Calvert, Deryl

From: Lawson, Randy
Sent: Friday, February 08, 2013 10:51 AM
To: Calvert, Deryl
Subject: Oil leak

We found an oil leak on unit U2909 during the MFRCP yard check on 2/6/13, I notified the office about the leak and someone came out immediately to clean it up. The unit had leaked about a ¼ of a quarts onto the ground in the unscheduled line parking area, floor dry was put on the oil, the unit was moved to the containment area and a drain pan put under it until it could be brought into the shop, the floor dry was swept up and disposed of properly

Randy Lawson
Fleet Management Operation Supervisor
Public Works
City of Colorado Springs
TEL 719-385-6622
CEL 719-499-3107
FAX 719-385-6612
rlawson2@springsgov.com

CITY of COLORADO SPRINGS
FLEET MANAGEMENT
MUNICIPAL FACILITY RUNOFF CONTROL PROGRAM
WEEKLY - POV VEHICLE INSPECTION LOG 08/01/12 TO 07/30/13

Main Garage - 404 West Fontanero

WEEK OF	DATE INSPECTED	INSPECTED BY	COMMENTS
6-Aug	8/6/12	Daryl Colvin	NO ISSUES
13-Aug	8/13/12	Daryl Colvin	NO ISSUES
20-Aug	8/20/12	Daryl Colvin	NO ISSUES
27-Aug	8/27/12	Daryl Colvin	NO ISSUES
3-Sep	9/4/12	Daryl Colvin	NO ISSUES
10-Sep	9/10/12	Daryl Colvin	NO ISSUES
17-Sep	9/14/12	Daryl Colvin	NO ISSUES
24-Sep	9/24/12	Daryl Colvin	NO ISSUES
1-Oct	10/1/12	Daryl Colvin	NO ISSUES
8-Oct	10/8/12	Daryl Colvin	NO ISSUES
15-Oct	10/15/12	Daryl Colvin	NO ISSUES
22-Oct	10/22/12	Daryl Colvin	NO ISSUES
29-Oct	10/29/12	Daryl Colvin	NO ISSUES
5-Nov	11/5/12	Daryl Colvin	NO ISSUES
12-Nov	11/13/12	Daryl Colvin	NO ISSUES
19-Nov	11/19/12	Daryl Colvin	NO ISSUES
26-Nov	11/26/12	Daryl Colvin	NO ISSUES
3-Dec	12/3/12	Daryl Colvin	NO ISSUES (Oil??)
10-Dec	12/10/12	Daryl Colvin	NO ISSUES
17-Dec	12/18/12	Daryl Colvin	SNOW NO ISSUES
24-Dec	12/26/12	Daryl Colvin	NO SNOW NO ISSUES
31-Dec	1/2/13	Daryl Colvin	NO ISSUES
7-Jan	1/7/13	Daryl Colvin	NO ISSUES
14-Jan	1/14/13	Daryl Colvin	NO ISSUES
21-Jan	1/18/13	Daryl Colvin	NO ISSUES
28-Jan	1/28/13	Daryl Colvin	NO SNOW "Lot Scraped"
4-Feb	2/4/13	Daryl Colvin	NO ISSUES Oil??
11-Feb			
18-Feb			
25-Feb			
4-Mar			
11-Mar			

CITY of COLORADO SPRINGS
FLEET MANAGEMENT
MUNICIPAL FACILITY RUNOFF CONTROL PROGRAM
ACTIVITY FREQUENCY LOG 08/01/12 TO 07/31/13
MAIN GARAGE, 404 WEST FONTANERO

SWEEP / CLEAN / WASH ALL PAVED / CONCRETE AREAS AT LEAST
3 TIMES PER YEAR, AFTER WINTER SANDING OPERATIONS OR AS NEEDED

TRASH / LITTER PICKUP SHALL BE DONE LEAST 3 TIMES PER YEAR OR AS NEEDED
THIS SHALL INCLUDE ALL AREAS WITHIN THE LOCATION PROPERTY BOUNDARIES,
INSIDE OR OUTSIDE THE FENCED AREA AND STORM WATER OUTLETS

SPILL / DISCHARGES SHALL BE ADDRESSED ASAP
CLEAN UP MATERIALS SHALL BE PICKED UP WITHIN 24 HOURS OF THE SPILL / DISCHARGE
FOR NECESSARY NOTIFICATION, CLEAN UP PROCEDURES AND DISPOSAL
REFER TO THE
DEPARTMENT MFRCP - MUNICIPAL FACILITY RUNOFF CONTROL PLAN
DEPARTMENT / EVS - ENVIRONMENTAL PROCEDURES
SPCC - SPILL PREVENTION CONTROL and COUNTERMEASURE PLANS

LOT SWEEPING / CLEANING / WASHING

DATE	START TIME	END TIME	ACTIVITY PREFORMED	VENDOR	COST
8-15	7:15 A	8:15 A	use street sweeper Around Pumps	Dennis	
10/23	NOON	2 pm	Pond Filter changed 22/SOXS	[illegible]	
11-13	4:00 AM	5:30 AM	Swept lot/North side	Streets	
11/21			Geyser Wash - Fuel Islands	Geys	$450.00
11/26	9:30 am	12:30 am	Swept lot	Fleet	
2/1			Geyser Wash Fuel Islands 8304		$430.50

LOT TRASH / LITTER CLEAN UP

DATE	START TIME	END TIME	ACTIVITY PREFORMED	VENDOR	COST

SPILLS / DISCHARGES

DATE	START TIME	END TIME	SPILL / DISCHARGE INFO	COST
2/6/12	14:00	14:30	U.2909 ½ gal Hyd oil · cleanup by Shop see e-mail DRE	$78.00

OTHER ACTIVITY

DATE	START TIME	END TIME	ACTIVITY PREFORMED	VENDOR	COST

NOTES

SIGNATURE :	PRINT NAME :	DATE :

Calvert, Deryl

From: Lawson, Randy
Sent: Friday, February 08, 2013 10:51 AM
To: Calvert, Deryl
Subject: Oil leak

We found an oil leak on unit U2909 during the MFRCP yard check on 2/6/13, I notified the office about the leak and someone came out immediately to clean it up. The unit had leaked about a ¼ of a quarts onto the ground in the unscheduled line parking area, floor dry was put on the oil, the unit was moved to the containment area and a drain pan put under it until it could be brought into the shop, the floor dry was swept up and disposed of properly

Randy Lawson
Fleet Management Operation Supervisor
Public Works
City of Colorado Springs
TEL 719-385-6622
CEL 719-499-3107
FAX 719-385-6612
rlawson2@springsgov.com

Employee Training Records

NAME	YEAR	MONTH	DAY	VENDOR	CLASS	EXP	HOURS	COST	CERT	NOTES
Calvert, Deryl	2012	February	28	Safety Meeting	Feb 2012, Back Safety, ESD, SPCC, MFRCP		1.00	FREE		
Calvert, Deryl	2012	February	21	Safety Committee	Fleet 2012 - Fleet EHS Committee		1.00	FREE		
Calvert, Deryl	2012	April	24	Safety Committee	Fleet 2012 - Fleet EHS Committee		1.00	FREE		
Calvert, Deryl	2012	May	8	Fleet EHS Meeting	EHS 05/08/12 - ESD, DC's 10 , CSU Security		1.50	FREE		
Calvert, Deryl	2012	September	25	Safety Committee	Fleet EHS, MFRCP Committee Meeting		2.00	FREE		
Calvert, Deryl	2012	November	14	Safety Committee	Fleet EHS Committee Meeting		2.00	FREE		

CITY of COLORADO SPRINGS 8/14/2012
FLEET MANAGEMENT
MUNICIPAL FACILITY RUNOFF CONTROL PROGRAM
COST LOG FOR 08/01/12 TO 07/31/13

FLEET MAIN GARAGE, 404 WEST FONTANERO

FLEET CAPITAL & O&M COST ASSOCIATED WITH RUNOFF CONTROL PLAN			
BRIEF DESCRIPTION OF EXPENDITURES	**FREQUENCY OR ITEMS**	**COST**	**TOTAL**
PARKING LOT SWEEPING - INTERNAL / FLEET	Shop		
PARKING LOT SWEEPING - OUTSOURCED	Remedy - Temp		
SPILL SUPPLIES	Pads, Socks & drip pans		
PPE	Gloves, Coveralls		
ADMINISTRATIVE	Printing, Office supplies		
SAND TRAP CLEANING	For all locs, once per year		
FUEL ISLAND CLEANING	Geysr Wash		
SECONDARY CONTAINMENT CLEANING	Geysr Wash		
CSU COST			
MISC	N/A		
TOTALS			$0.00

FLEET LABOR COST ASSOCIATED WITH RUNOFF CONTROL PLAN			
BRIEF DESCRIPTION OF EXPENDITURES	**FREQUENCY OR HOURS**	**COST PER HR**	**TOTAL**
INSPECTIONS, QUARTERLY & ANNUAL	3 hrs per year		
FUEL SITE INSPECTIONS	1 inspection per site per year = 8hr		
DAILY LOT INSPECTIONS	1/4 hr per day x 250 = 62.5 hrs		
MFRCP ADMINISTRATION	12 hrs per year		
TRAINING, TIME & CLASS COST	254 hrs plus $921.00 on class cost		
POV PARKING INSPECTIONS	53 weeks x 1/4 hr = 13.25 hrs		
SECONDARY CONTAINMENT INSPECTIONS	20 weeks x 1/4 hr = 5 hrs		
SECONDARY CONTAINMENT, DRAIN & CLEAN	8 times @ 3 hrs		
FLEET SPILL RESPONSE	3 hrs (for 3 spills)		
CSU COST			
MISC SHOP	3 hrs		
TOTALS			

NOTES :

CITY of COLORADO SPRINGS
FLEET MANAGEMENT
MUNICIPAL FACILITY RUNOFF CONTROL PROGRAM
DAILY LOT / VEHICLE INSPECTION LOG 08/01/12 TO 07/31/13
FLEET MAIN GARAGE, 404 WEST FONTANERO

DATE	INSPECTED YES / NO	INSPECTED BY	COMMENTS
1-Feb	Yes	Nelson	ok
2-Feb	~~Yes~~	~~Nelson~~	~~ok~~
3-Feb			
4-Feb			
5-Feb	Yes	Nelson	ok
6-Feb	Yes	Nelson	ok
7-Feb	Yes	Dave DeLaCruz	ok
8-Feb	Yes	Nelson	ok
9-Feb			
10-Feb			
11-Feb			
12-Feb			
13-Feb			
14-Feb			
15-Feb			
16-Feb			
17-Feb			
18-Feb			
19-Feb			
20-Feb			
21-Feb			
22-Feb			
23-Feb			
24-Feb			
25-Feb			
26-Feb			
27-Feb			
28-Feb			

MFRC Aug 17, 2012 ORC